MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

EFFECTIVE DATE: April 27, 2015 REVISION DATES: August 25, 2015; December 5, 2016, August 2, 2018

> ISSUED TO: Ventra Travel Holdings Corporation Ventra Evart, LLC

State Registration Number (SRN): A5764

LOCATED AT:

601 West Seventh Street, Evart, Osceola County, Michigan 49631

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-A5764-2015c

Expiration Date: April 27, 2020

Administratively Complete ROP Renewal Application Due Between: October 27, 2018 and October 27, 2019

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-A5764-2015c

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

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Shane Nixon, Cadillac/Gaylord District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order Number 16-2009 entered on August 17, 2009 between the MDEQ and the permittee.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R 336.1213(5))
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))

General Provisions

- The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (R 336.1213(1)(a))
- It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (R 336.1213(1)(b))
- 3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (R 336.1213(1)(c))
- 4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (R 336.1213(1)(d)):
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
- 5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R 336.1213(1)(e))

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- 6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))
- 7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

Equipment & Design

- 9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² (R 336.1370)
- 10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R 336.1910)

Emission Limits

- 11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:" ² (R 336.1301(1))
 - a. A 6-minute average of 20 % opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

- 12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ (R 336.1901(a))
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ (R 336.1901(b))

Testing/Sampling

- 13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² (R 336.2001)
- 14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
- 15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(5))

Monitoring/Recordkeeping

- 16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. (R 336.1213(3)(b))
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
- 17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (R 336.1213(1)(e), R 336.1213(3)(b)(ii))

Certification & Reporting

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- 21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (R 336.1213(3)(c))
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

- 22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following (R 336.1213(3)(c)):
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
- 23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. (R 336.1213(3)(c)(i))
- 24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. (R 336.1212(6))
- 25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² (**R 336.1912**)

Permit Shield

- 26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. (R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

- 27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. (R 336.1213(6)(b)(i))
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. (R 336.1213(6)(b)(ii))
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. (R 336.1213(6)(b)(iii))

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))
- 28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(iii))
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (R 336.1216(1)(c)(iii))
 - d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))
- 29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(c), R 336.1217(1)(a))

Revisions

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (R 336.1210(10))
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))

Reopenings

- 34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
 - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. (R 336.1217(2)(a)(i))
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (R 336.1217(2)(a)(ii))
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. (R 336.1217(2)(a)(iii))
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (R 336.1217(2)(a)(iv))

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. (R 336.1210(8))

Stratospheric Ozone Protection

- 36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
- 37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

- 38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
- 39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - c. The date on which a regulated substance is first present above a threshold quantity in a process.
- 40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
- 41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. (R 336.1213(12))

Permit To Install (PTI)

- 43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (R 336.1201(1))
- 44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (R 336.1201(8), Section 5510 of Act 451)
- 45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² (R 336.1219)
- 46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R 336.1201(4))

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	Less than 225 tpy*,²	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
	* Beginning upon permit issuance, and continuing for the first 12 calendar months, this limit applies to the cumulative total VOC emissions. Thereafter, the limit shall become a 12-month rolling limit.				

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205)**
- 2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a. Gallons or pounds of each VOC containing material used.
 - b. Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c. VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
 - d. VOC emission calculations determining the monthly emission rate of each in tons per calendar month for FGFACILITY.
 - e. VOC emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month for FGFACILITY.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(3))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The conditions contained in this ROP for which a Consent Order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Order. The effective date of termination is defined, for the purposes of the conditions, as the date upon which the Termination Order is signed by the Chief of the AQD.

Footnotes:

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

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUFASCIA-LINE	Fascia line is used to apply adhesion promoter, base coat, and clear coat to fascia. There are automatic (robot) and manual booths for each coating type. Automatic booths are vented through a water curtain followed by a regenerative thermal oxidizer (RTO). Manual booths have dry fabric filters. (PTI No. 87-15)	11/27/02	FGMACT-PPPP
EUFIREPUMP1 A 130HP diesel fuel-fired, Compression Ignition engine used to power the building emergency fire suppression water pump.		04/96	NA
EUBOILER1	1.82 MMBTU natural gas fired boiler used to keep the fire suppression water above freezing.	01/97	NA
EUDBOOTH-4698	Single dry filter spray booth and Area D drying oven, controlled by dry fabric filters. (PTI No. 87-15)	06/30/93	FGMACT-PPPP
EUCOLDCLEANER	Any new cold cleaner (placed into operation after 07/01/1979) that is exempt from NSR permitting by R 336.1281(h) or R 336.1285 (r)(iv).	NA	FGCOLDCLEANERS
EURULE290	Generally, all equipment that is exempt from the requirement to obtain a Permit to Install pursuant to R 336.1290.	NA	FGRULE290
EUAM3800	Generally, all equipment that is exempt from the requirement to obtain a Permit to Install pursuant to R 336.1287(c). Specifically, the quality control lab spray booth, Asset # AM3800.	NA	FGRULE287(c)

EUFASCIA-LINE EMISSION UNIT CONDITIONS

DESCRIPTION

Fascia line is used to apply adhesion promoter, base coat, and clear coat to fascia. There are automatic (robot) and manual booths for each coating type. Automatic booths are vented through a water curtain followed by a RTO. Manual booths have dry fabric filters. (PTI No. 87-15)

Flexible Group ID: FGMACT-PPPP, FGFACILITY

POLLUTION CONTROL EQUIPMENT

Fabric Filters, Water Curtain, RTO

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Volatile Organic Compounds (VOC)	168.3 pounds per hour ²	Test Protocol*	EUFASCIA-LINE	SC V.3	40 CFR 52.21(j) R 336.1702(a) R 336.1225 (Consent Order AQD No. 16-2009)
2.	Volatile Organic Compounds (VOC)	135 tons per year ²	12-month rolling time period as determined at the end of each calendar month	EUFASCIA-LINE	SC VI.8	40 CFR 52.21(j) R 336.1702(a) R 336.1225 (Consent Order AQD No. 16-2009)

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements	
1.	Adhesion Promoter	1.0 lb VOC/gal (minus water) ^a as applied, after controls ²	Daily volume-weighted average	EUFASCIA-LINE	SC V.1 SC VI.2 SC VI.5	40 CFR 52.21(j) R 336.2810 R 336.1702(a)	
2.	Basecoat	0.7 lb VOC/gal (minus water) ^a as applied, after controls ²	Daily volume-weighted average	EUFASCIA-LINE	SC V.1 SC VI.2 SC VI.5	40 CFR 52.21(j) R 336.2810 R 336.1702(a)	
3.	Clearcoat	0.7 lb VOC/gal (minus water) ^a as applied, after controls ²	Daily volume-weighted average	EUFASCIA-LINE	SC V.1 SC VI.2 SC VI.5	40 CFR 52.21(j) R 336.2810 R 336.1702(a)	
	^a The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))						

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III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate the EUFASCIA-LINE unless a minimum temperature of 1400 °F and a minimum retention time of 0.5 seconds in the combustion chamber of the RTO is maintained.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
- The permittee shall maintain a minimum overall VOC control efficiency (combined capture and destruction efficiency) of 86% across EUFASCIA-LINE.² (40 CFR 52.21(j), R 336.2810, R 336.1910, R 336.1702(a), R 336.1225, R 336.1205)
- 3. The permittee shall not operate the fascia line unless all automatic booth water wash equipment is installed and operating properly.² (R 336.1910, R 336.1301(1)(c))
- 4. The permittee shall not operate the fascia line unless all manual booth dry filters are installed and operating properly.² (R 336.1910, R 336.1301(1)(c))
- 5. The permittee shall not operate EUFASCIA-LINE unless the RTO is installed and operating properly in accordance with the MAP.² (40 CFR 52.21(j), R 336.2810, R 336.1911, R 336.1910, R 336.1702(a), R 336.1205)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. All coating applicators shall be properly installed maintained and operated according to manufacturer's specifications.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
- The permittee shall use either electrostatic guns or bells for automatic and manual booth application of adhesion promoter, basecoat, and clearcoat coatings. The spray guns for all coating application will be either HVLP applicators, multi-port spray equipment, or equivalent technology with comparable transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
- 3. The combustion chamber of the RTO shall have a minimum retention time of 0.5 seconds.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a), R 336.1205)
- 4. The permittee shall install a device to monitor and record the inlet static duct pressure of the RTO. (R 336.1213(3)(b)(ii), 40 CFR 64.4(e))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The VOC content of coatings, as applied, minus water, shall be tested on an annual basis using USEPA Method 24. The five most frequently used coatings plus five random coatings shall be tested.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
- 2. Upon prior written approval by the AQD District Supervisor, the VOC content of coatings may be determined using manufacturers formulation data.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
- 3. The permittee shall verify, by testing at the owner's expense, control efficiency (capture and destruction) of the RTO, and the VOC emission rate, in pounds per hour, for EUFASCIA-LINE every five years, using a method approved by the AQD.² (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall conduct performance testing to correlate the VOC emission rate in lbs/hr with the inlet static duct pressure. Monitoring, based on the performance tests, shall begin no later than 180 days after issuance of the ROP. (40 CFR 64.4(e), 40 CFR 64.6(d))

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- The permittee shall keep a record of the identification and the coating category (adhesion promoter, basecoat, or clear coat) for each coating used.² (40 CFR 52.21(j), Consent Order AQD No. 16-2009, R 336.2810, R 336.1702(a))
- The permittee shall keep a record of the VOC content in pounds per gallon of coating (minus water) as received and as applied for each coating category (adhesion promoter, basecoat, or clear coat) and for each coating used.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a), Consent Order AQD No. 16-2009, and 40 CFR, Part 60, Appendix A, Method 24)
- 3. The permittee shall keep a record of the VOC content in pounds per gallon of reducers and catalysts used.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a), Consent Order AQD No. 16-2009, and 40 CFR, Part 60, Appendix A, Method 24)
- 4. The permittee shall keep a daily record of the amount, in gallons, of coating applied.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
- The permittee shall calculate and keep daily records of the volume weighted average VOC content (after controls) as applied for each coating category (adhesion promoter, basecoat, or clear coat), using the methods detailed in Appendix 7 or an acceptable method approved by the District Supervisor.² (40 CFR 52.21(j), R 336.1702(a), R 336.2810, and Consent Order AQD No. 16-2009)
- 6. The permittee shall keep a monthly record of the amount, in gallons, of cleanup and purge solvents used and reclaimed.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
- The permittee shall utilize the RTO combustion chamber temperature as an indicator of proper function of the RTO. The appropriate range of temperature defining proper operation of the RTO is 1400°F to 1600°F. (40 CFR 64.6(c)(1)(i),(ii))
- 8. The permittee shall utilize RTO inlet static duct pressure as an indicator of proper function of the capture system. The appropriate inlet static duct pressure defining proper operation of the capture system shall be determined through performance testing. The current indicator range is between 0.47 inches water column to 0.72 inches water column while EUFASCIA-LINE is operating. (40 CFR 64.6(c)(1)(i),(ii))
- The permittee shall monitor and record the temperature in the RTO combustion chamber on a continuous basis and maintain continuous records of the temperature in the RTO.² (40 CFR 52.21(j), R 336.2810, R 336.1205, R 336.1702(a), 40 CFR 64.6(c)(1)(iii))
- 10. The permittee shall monitor the RTO inlet static duct pressure on a continuous basis and record the static duct pressure at least once every 15 minutes while EUFASCIA-LINE is operating. **(40 CFR 64.6(c)(1)(iii))**
- 11. The permittee shall calculate and record the VOC emission rates using the formulas in Appendix 7 to determine VOC emission rates in pounds per hour, tons per month, and tons per 12-month rolling time period as determined at the end of each calendar month. (R 336.1213(3), and Consent Order AQD No. 16-2009)
- 12. The permittee shall calculate and record the VOC emission rates in tons per month, and tons per 12-month rolling time period as determined at the end of each calendar month. (40 CFR 52.21(j), R 336.2810, R 336.1702(a), R 336.1225, Consent Order AQD No. 16-2009)

- 13. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks, required zero, and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that EUFASCIA-LINE is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64, compliance including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 14. The permittee shall use the RTO temperature to assure compliance with the VOC limit. An excursion for VOC shall occur if the RTO temperature measured in the combustion chamber is less than 1425 °F while EUFASCIA-LINE is operating. (40 CFR 64.6(c)(2))
- 15. The permittee shall use the RTO inlet static duct pressure to assure compliance with the VOC limit. An excursion for VOC shall occur if the static duct pressure at the inlet of the RTO is less than the level determined through performance testing while EUFASCIA-LINE is operating. **(40 CFR 64.6(c)(2))**
- 16. Upon detecting an excursion or exceedance, the permittee shall restore operation of EUFASCIA-LINE (including RTO and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The permittee shall document the actions taken to restore normal operation. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). In response to an excursion of the combustion chamber temperature less than 1425 °F or the static duct pressure at the inlet of the RTO less than 0.52 inches water column based on a three hour average while EUFASCIA-LINE is operating, the permittee shall refer to the monitoring requirements outlined in the MAP. (40 CFR 64.7(d))
- 17. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))
- 18. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. (40 CFR 64.9(b)(1))

See Appendix 7

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Quarterly reporting demonstrating compliance with applicable VOC emission and content limits shall be submitted to the District Supervisor within 30 days following the end of a calendar quarter in which the data were collected.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a), Consent Order AQD No. 16-2009)

- 5. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3), R 336.1213(3))
- 6. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4) R 336.1213(3))
- The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5), 40 CFR 63.4520(b), R 336.1213(3))
- 8. Results of VOC content testing shall be submitted to the AQD District Supervisor within 30 days of the completion of testing.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
- 9. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. (40 CFR 64.9(a)(2)(i))
- Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. (40 CFR 64.9(a)(2)(ii))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Ver	nt ID Dime	m Exhaust ensions ches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-FL-ADHES	MAN	48 ²	58 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
2. SV-FL-BASE-N	IAN S	56 ²	58 ²	R 336.1225 R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
3. SV-FL-CLEAR-	MAN	48 ²	58 ²	R 336.1225 R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
4. SV-FL-THERM	AL-OX 8	32 ²	58 ²	R 336.1225 R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

- 1. All purge solvents and coating from all coating applicators used in the fascia line shall be captured and stored in closed containers and disposed of in an acceptable manner.² (R 336.1702(a))
- 2. The permittee shall comply with all applicable requirements of 40 CFR, Part 64. (40 CFR, Part 64)

3. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUFIREPUMP1 EMISSION UNIT CONDITIONS

DESCRIPTION

An emergency diesel fuel-fired (compression ignition) reciprocating internal combustion engine (RICE) rated at 130 horsepower located at a major source of HAP emissions, used to power the building emergency fire suppression water pump.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Fallinmont	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee may operate EUFIREPUMP as necessary during emergencies with no time limit. (40 CFR 6640(f)(1))
- 2. The permittee shall minimize the time spent at idle and minimize start-up to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. (40 CFR 63.6602, 40 CFR 63.6625(h), and 40 CFR, Part 63, Subpart ZZZZ, Table 2c, Item 1)
- 3. The permittee must comply with the following operational requirements:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in Condition III.4;
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace if necessary;
 - c. Inspect all hoses and belts every 500 hours or operation or annually, whichever comes first, and replace if necessary.

If EUFIREPUMP is operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended. The permittee must report any failure to perform the work practice on the schedule required. **(40 CFR 63.6602, and 40 CFR, Part 63, Subpart ZZZZ, Table 2c, Item 1)**

- 4. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition III.3. The oil analysis program must be performed at the same frequency specified for changing the oil in Condition III.3. The oil analysis shall test for the following limits:
 - a. Total Base Number is less than 30% of the Total Base Number of the oil when new;
 - b. Viscosity of the oil has changed by 20% from the viscosity of the oil when new;
 - c. Percent water content (by volume) is greater than 0.5%.

If any of the limits are exceeded, the permittee must change the oil within two days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee must change the oil within two days or before commencing operation, whichever is later. The analysis program must be part of the maintenance plan for EUFIREPUMP. (40 CFR 63.6625(i))

- 5. The permittee must be in compliance with the emission limitations, operating limitations, and other requirements in 40 CFR, Part 63, Subpart ZZZZ that apply to EUFIREPUMP at all times. (40 CFR 63.6605(a))
- 6. The permittee at all times must operate and maintain EUFIREPUMP in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by 40 CFR, Part 63, Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the EUFIREPUMP. (40 CFR 63.6605(b))
- The permittee must operate and maintain EUFIREPUMP according to the manufacturer's emission-related written operation and maintenance instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e), 40 CFR 63.6640(a), and 40 CFR, Part 63, Subpart ZZZZ, Table 6, Item 9)
- 8. The permittee may operate EUFIREPUMP for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the engine manufacturer or vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing is limited to 100 hours per year. (40 CFR 63.6640(f)(2)(i))
- 9. The permittee may operate EUFIREPUMP for up to 50 hours per engine per year in non-emergency situations, which are counted as part of the 100 hours of operation allowed under Condition III.8. **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip EUFIREPUMP with a non-resettable hour meter. (40 CFR 63.6625(f))

V. <u>TESTING/SAMPLING</u>

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall keep the following records: (40 CFR 63.6655)
 - a. A copy of each notification and report submitted to comply with 40 CFR, Part 63, Subpart ZZZZ, including all documentation supporting any initial Notification or Notification of Compliance Status, according to the requirements of 40 CFR 63.10(b)(2)(xiv).
 - b. Records of the occurrence and duration of each malfunction of operation.
 - Records of actions taken during period of malfunctions to minimize emissions in accordance with 40 CFR 63.6605(b) including, corrective actions to restore malfunctioning equipment to is normal or usual manner of operation.

- d. Records of the maintenance conducted on EUFIREPUMP in order to demonstrate that EUFIREPUMP is operated and maintained according to the maintenance plan.
- e. Records of the hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation (including what classified the operation as an emergency) and how many hours were spent during non-emergency operation.
- f. Records to demonstrate continuous compliance with the operating limitations in SC III.7.
- 2. The permittee shall keep records of the parameters that are analyzed as part of the oil analysis program in SC III.4, the results of the analysis, and the oil changes for the engine. (40 CFR 63.6625(j))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i), 40 CFR 63.6640(b), 40 CFR 63.6650(f))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR, Part 63, Subparts A and ZZZZ for Stationary Reciprocating Internal Combustion Engines. (40 CFR, Part 63, Subparts A and ZZZZ)

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUBOILER1 EMISSION UNIT CONDITIONS

DESCRIPTION

A 1.82 MMBTU natural gas-fired boiler used to keep the fire suppression system water above the freezing point.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Fallinment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Fallinmont	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall complete an initial tune-up by following procedures described in 40 CFR 63.7540(a)(10)(i) through (vi) no later than January 31, 2016. Subsequent tune-ups must be completed every 5-years of the initial compliance date of January 31, 2016, but must be conducted no more than 61 months after the previous tune-up. (40 CFR 63.7510(e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12), and 40 CFR Part 63, Subpart DDDDD, Table 3.1)
- The permittee shall complete a one-time energy assessment specified in 40 CFR Part 63, Subpart DDDDD, Table 3.4(a) through (h) no later than January 31, 2016. (40 CFR 63.7510(e), and 40 CFR Part 63, Subpart DDDDD Table 3.4)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit an initial notification of compliance (NOC) within 60 days of completing all compliance demonstrations. The following shall be submitted in the NOC Report: (40 CFR 63.7545(c))
 - a. A signed statement in the NOC report that indicates the permittee conducted a tune-up. (40 CFR 63.7530(d))
 - b. A signed certification that an energy assessment was completed according to 40 CFR Part 63, Subpart DDDDD, Table 3 and is an accurate depiction of the facility at the time of the assessment. (40 CFR 63.7530(e))
- 5. The permittee shall submit an initial compliance report, no later than January 31, 2021 as described in 40 CFR 63.7550(b). The compliance report shall include the following information: **(40 CFR 63.7550(b))**
 - a. Company name, facility name, and address.
 - b. Process unit information, emission limitations and operating parameter limitations.
 - c. Date of report and beginning and ending dates of the reporting period.
 - d. The total operating time during the reporting period.

The date of the most recent tune-up for EUBOILER1 and the most recent burner inspection if it was not inspected annually, biennially, or on a 5-year schedule, and was delayed until the next unit shut-down.

The permittee shall submit subsequent compliance reports every 5 years. No later than January 31st. (40 CFR 63.7550(b))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. Permittee shall comply with all applicable requirements of 40 CFR, Part 63, Subpart DDDDD by January 31, 2016. (40 CFR, Part 63, Subpart DDDDD)

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUDBOOTH-4698 EMISSION UNIT CONDITIONS

DESCRIPTION

Single dry filter spray booth and Area D drying oven, controlled by dry fabric filters.

Flexible Group ID: FGMACT-PPPP

POLLUTION CONTROL EQUIPMENT

Fabric Filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	0.65 tons/day ²	Calendar Day	EUDBOOTH-4698	SC VI.1	R 336.1205(1)(a), R 336.1702(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements	
1. Coating	6.3 lb VOC/gal (minus water) ^a as applied ²	Daily volume-weighted average	EUDBOOTH-4698	SC VI.1	R 336.1702(c)	
^a The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))						

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any paint spray booth unless all exhaust filters are in place and operating properly.² (R 336.1301(1)(c), R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The VOC content, water content, density, solids weight fraction, solids volume fraction of any coating, as applied or as received, shall be tested using USEPA Method 24. The five most frequently used coatings plus five random coatings shall be tested on an annual basis.² (R 336.1702(a))
- 2. Upon prior written approval by the AQD District Supervisor, the VOC content of coatings may be determined using manufacturers formulation data.² (R 336.1702(a))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall keep the following information on a daily basis for EUDBOOTH-4698:
 - a. Gallons or pounds of each VOC containing material used.
 - b. Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c. VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.

d. VOC emission calculations determining the daily emission rate of each in tons per calendar day.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a), R 336.1702(c))

See Appendix 7

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Quarterly reporting demonstrating compliance with applicable VOC emission and content limits shall be submitted to the District Supervisor within 30 days following the end of each calendar quarter in which the data were collected.² (R 336.1702(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-MISC-BOOTHS	NA	18 ²	40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACT-PPPP	substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.	
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANER
FGRULE290	Generally, all equipment that is exempt from the requirement to obtain a Permit to Install pursuant to R 336.1290.	EURULE290
FGRULE287(c) Generally, all equipment that is exempt from the requirement to obtain a Permit to Install pursuant to R 336.1287(c). Specifically, the quality control lates spray booth, Asset # AM3800.		EUAM3800
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment. (PTI No. 87-15)	NA

FGMACT-PPPP FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements of the Surface Coating of Plastic Parts and Products National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR, Part 63, Subpart PPPP as they apply to specific emission units.

Emission Units: EUFASCIA-LINE, EUDBOOTH-4698

POLLUTION CONTROL EQUIPMENT

RTO (when using "add-on control" option for EUFASCIA-LINE)

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Organic HAP from general use coating	0.16 pound per pound of coating solids used	Each 12-month rolling time period as determined at the end of the month	EUFASCIA-LINE EUDBOOTH-4698	SC V.1 SC VI.5 SC VI.8 SC VI.10	40 CFR 63.4490(b)(1)
2.	Organic HAP from automotive lamp coating	0.45 pound per pound of coating solids used	Each 12-month rolling time period as determined at the end of the month	EUFASCIA-LINE EUDBOOTH-4698	SC V.1 SC VI.5 SC VI.8 SC VI.10	40 CFR 63.4490(b)(2)
3.	Organic HAP from thermoplastic olefin (TPO) coating	0.26 pound per pound of coating solids used	Each 12-month rolling time period as determined at the end of the month	EUFASCIA-LINE EUDBOOTH-4698	SC V.1 SC VI.5 SC VI.8 SC VI.10	40 CFR 63.4490(b)(3)

- 4. When EUFASCIA-LINE and/or EUDBOOTH-4698 are using the compliant material option or the emission rate without add-on controls option shall be in compliance with the applicable emission limits in at all times. (40 CFR 63.4500(a)(1))
- 5. When EUFASCIA-LINE is using the emission rate with add-on controls option shall be in compliance with the applicable emission limits in SC I.1-3 at all times except during periods of startup, shutdown, and malfunction. (40 CFR 63.4500(a)(2)(i))
- 6. The permittee may comply separately with each emission limit, or comply with a predominant activity or facility-specific emission limit as provided in 40 CFR 63.4490(c)(1) or (2). (40 CFR 63.4490(c))

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements	
1.	Each thinner and/or other additive	No Organic HAP*	Compliant material option	EUFASCIA-LINE EUDBOOTH-4698	SC VI.6	40 CFR 63.4491(a) 40 CFR 63.4542(a)	
2.	Each cleaning material	No Organic HAP*	Compliant material option	EUFASCIA-LINE EUDBOOTH-4698	SC VI.6	40 CFR 63.4491(a) 40 CFR 63.4542(a)	
*	* Determined according to 40 CFR 63.4541(a).						

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. When EUFASCIA-LINE uses the emission rate with add-on controls option, the permittee shall meet the operating limits identified below. (40 CFR 63.4492(b) and Table 1)

Add-on Control Device	Operating Limit
RTO	The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established during performance testing. (40 CFR 63.4567(a))
Emission capture system	The average gas volumetric flow rate or duct static pressure in each duct between a
that is not a permanent total	
enclosure (PTE) according	
to 40 CFR 63.4565(a).	that capture device during performance testing. (40 CFR 63.4567(f))

- 2. When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall be in compliance with the operating limits for emission capture systems and the RTO, at all times except during periods of startup, shutdown, and malfunction. (40 CFR 63.4492, 40 CFR 63.4500(a)(2)(ii))
- 3. When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall be in compliance with the work practice standards addressed in SC IX.1, at all times. (40 CFR 63.4493, 40 CFR 63.4500(a)(2)(iii))
- The permittee shall not operate EUFASCIA-LINE when using the emission rate with add-on controls option, unless the RTO and capture system are installed, maintained, and operated in a satisfactory manner. The permittee shall meet the operating limits in SC III.1, applied to the emission capture system and RTO. (40 CFR 63.4492(b), 40 CFR 63.4500(b))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall install a gas temperature monitor in the firebox of the RTO or the duct immediately downstream of the firebox before any substantial heat exchange occurs. Additionally, the permittee shall locate the temperature sensor in a position that provides a representative temperature, with a measurement sensitivity of 5°F or 1.0% of the temperature value, whichever is larger. (40 CFR 63.4563(c), 40 CFR 63.4568(c)(3))
- 2. The permittee shall locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system of the RTO. A flow sensor with an accuracy of at least 10% of the flow shall be used. (40 CFR 63.4563(c), 40 CFR 63.4568(g)(1))
- 3. The permittee shall locate pressure sensor(s) in or as close to a position that provides a representative measurement of the pressure drop across each opening being monitoring. The permittee shall use a pressure sensor with an accuracy of at least 0.5 inches of water column or 5% of the measured value, whichever is larger. (40 CFR 63.4563(c), 40 CFR 63.4568(g)(2))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.4531)

- 1. When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall conduct a performance test according to the requirements in 40 CFR 63.7(e)(1) and under the following conditions, unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h): (40 CFR 63.4564(a))
 - a. The permittee shall conduct the performance test under representative operating conditions for the coating operation. Operations during periods of startup, shutdown, or malfunction and during periods of nonoperation do not constitute representative conditions.
 - b. The permittee shall conduct the performance test when the emission capture system and RTO are operating at a representative flow rate, and the RTO is operating at a representative inlet concentration.
- During performance testing in SC V.1, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.4567 to establish the emission capture system and RTO operating limits for temperature, flow rate, and duct static pressure required by 40 CFR 63.4492. (40 CFR 63.4492(b), 40 CFR 63.4560(a), 40 CFR 63.4567)
- 3. The permittee shall record the process information that is necessary to document operating conditions during performance testing and explain why the conditions represent normal operation. Additionally, the permittee shall record information that is necessary to document emission capture system and RTO operating conditions during the test and explain why the conditions represent normal operation. **(40 CFR 63.4564(a))**
- 4. The permittee shall perform capture efficiency and destruction efficiency testing every five years. The permittee shall conduct each performance test of the emission capture system and RTO capture efficiency and emission destruction or removal efficiency, according to the following requirements: **(40 CFR 63.4564(b))**
 - a. If the capture system does not meet 100% capture efficiency according to 40 CFR 63.4565(a), the permittee shall use one of the following protocols for the capture system: Liquid-to-uncaptured-gas protocol using a temporary enclosure or building enclosure; gas-to-gas protocol using a temporary total enclosure or building enclosure; or Alternative capture efficiency protocol, which are further described in 40 CFR 63.4565(c)(d) and (e).
 - b. To determine the RTO destruction or removal efficiency, the permittee shall measure total gaseous organic mass emissions as carbon at the inlet and outlet of the RTO simultaneously using either USEPA Method 25 or 25A in 40 CFR Part 60, Appendix A. Additionally, the permittee shall, for each test run, determine the total gaseous organic emissions mass flow rates for the inlet and outlet of the RTO.
- Before using the temperature sensor for the first time, after relocating or replacing the temperature sensor, a validation check shall be performed by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature. The permittee shall conduct an accuracy audit and a visual inspection of each temperature sensor on a quarterly basis. (40 CFR 63.4563(c), 40 CFR 63.4568(c)(3)(iii-v))
- The permittee shall perform a validation check upon relocation or replacement of a flow sensor. Validation checks include comparison of flow sensor values with electronic signals simulations or via relative accuracy testing. The permittee shall conduct an accuracy audit every quarter and after a deviation, perform quarterly visual inspections of the flow sensor, and perform monthly leak checks of the flow sensor. (40 CFR 63.4563(c), 40 CFR 63.4568(g)(1)(iv-vii)
- 7. The permittee shall perform an initial calibration of the pressure drop sensor according to the manufacturer's requirements and conduct a validation check upon relocation or replacement of the pressure drop sensor. The permittee shall conduct accuracy audits on a quarterly basis or after every deviation. Additionally, the permittee shall perform monthly leak checks on pressure connections. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. The permittee shall perform a visual inspection of the sensor at least monthly if there is no redundant sensor. (40 CFR 63.4563(c), 40 CFR 63.4568(g)(2)(iv-vii)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.4531)

- 1. The permittee shall maintain, at a minimum, the following records:
 - a. A copy of each notification and report that is submitted to comply with 40 CFR, Part 63, Subpart PPPP, and the documentation supporting each notification report. (40 CFR 63.4530(a))
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. (40 CFR 63.4530(b))
- 2. The permittee shall maintain, at a minimum, the following records for each 12-month rolling time period:
 - a. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. (40 CFR 63.4530(c)(1))
 - b. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. (40 CFR 63.4530(c)(2))
 - c. For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. (40 CFR 63.4530(c)(3))
 - d. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.4530(c)(4)(i) through (v). (40 CFR 63.4530(c)(4))
 - e. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. (40 CFR 63.4530(d))
 - f. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each 12-month rolling time period. (40 CFR 63.4530(e))
 - g. The mass fraction of coating solids for each coating used during each 12-month rolling time period. (40 CFR 63.4530(f))
 - h. In 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4). **(40 CFR 63.4530(g))**
 - i. The date, time, and duration of each deviation. (40 CFR 63.4530(h))
 - j. For the emission rate with add-on controls option, records specified in 40 CFR 63.4530(i)(1) through (8) below. (40 CFR 63.4530(i))
 - i. For each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction.
 - ii. Records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - ii. The records required to show continuous compliance with each operating limit specified in 40 CFR, Part 63, Subpart PPPP, Table 1 that applies to the facility.
 - iv. For each capture system that is a PTE, the data and documentation used to support a determination that the capture system meets the criteria in 40 CFR, Part 51, Appendix M, Method 204 for a PTE and has a capture efficiency of 100%, as specified in 40 CFR 63.4565(a).
 - v. For each capture system that is not a PTE, the data and documentation used to determine capture efficiency according to the requirements specified in 40 CFR 63.4564 and 63.4565(b) through (e).
 - vi. The records for the RTO organic HAP destruction or removal efficiency determination as specified in 40 CFR 63.4566.
 - vii. Records of the data and calculations the permittee used to establish the emission capture and RTO operating limits as specified in 40 CFR 63.4567 and to document compliance with the operating limits as specified in 40 CFR, Part 63, Subpart PPPP, Table 1.
 - viii. A record of the work practice plan required by 40 CFR 63.4493 and documentation that the permittee is implementing the plan on a continuous basis.

- 3. The permittee shall determine whether the organic HAP emission rate is equal to or less than the emission limits in SC I.1-3 using at least one of the following three options, listed below:
 - a. Compliant material option,
 - b. Emission rate without add-on controls option, or
 - c. Emission rate with add-on controls option.

The permittee shall include all coatings, thinners and/or other additives, and cleaning materials used when determining the emission rate. (40 CFR 63.4491)

COMPLIANT MATERIALS OPTION

- 4. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.4541 when using the emission rate compliance material option. **(40 CFR 63.4541)**
- 5. When using the compliant materials option, the permittee shall demonstrate compliance with the emission limits for each coating using Equation 1 of 40 CFR 63.4541 for each 12-month rolling time period. **(40 CFR 63.4542)**
- For each thinner and/or additives and cleaning material used, the permittee shall determine that each thinner and/or additives and each cleaning material used contain no organic HAP according to 40 CFR 63.4541(a). (40 CFR 63.4542)

EMISSION RATE WITHOUT ADD-ON CONTROLS OPTION

- 7. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.4551 when using the emission rate without add-on control option. **(40 CFR 63.4551)**
- 8. When using the emission rate without add-on control option, the permittee shall demonstrate compliance with the emission limits for each coating used in the coating operation by calculating the organic HAP emission rate for each 12-month rolling time period according to the calculations in 40 CFR 63.4551. (40 CFR 63.4552)

EMISSION RATE WITH ADD-ON CONTROLS OPTION

- 9. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.4561 when using the emission rate with add-on control option. (40 CFR 63.4561)
- 10. When using the emission rate with add-on controls option, the permittee shall calculate the organic HAP emission limit, and show continuous compliance for each 12-month rolling time period according to the calculations in 40 CFR 63.4561. (40 CFR 63.4563)
- 11. When using the emission rate with add-on controls option, the permittee shall operate the RTO temperature, flow rate, and duct static pressure (each Continuous Parameter Monitoring System (CPMS)) according to the following requirements: (40 CFR 63.4568)
 - a. The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. The permittee shall have a minimum of four equally spaced successive cycles of CPMS operation in 1 hour.
 - b. The permittee shall determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.
 - c. The permittee shall record the results of each inspection, calibration, and validation check of the CPMS.
 - d. The permittee shall maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment.
 - e. The permittee shall operate the CPMS and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).

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- f. The permittee shall not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. The permittee shall use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.
- 12. When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in SC III.1 using a RTO, with the applicable methods described below: (40 CFR 63.4563(c), 40 CFR 63.4568(c))
 - a. Collect the combustion temperature data.
 - b. Reduce the data to 3-hour block averages; and
 - c. Maintain the 3-hour average combustion temperature at or above the temperature limit.
- When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in SC III.1 while using the Emission capture system that is <u>not</u> a PTE according to 40 CFR 63.4565(a), with the applicable methods described below: (40 CFR 63.4563(c), 40 CFR 4568(g))
 - a. Collect the gas volumetric flow rate for each capture device.
 - b. Collect the duct static pressure for each capture device.
 - c. Reduce the data to 3-hour block averages; and
 - d. Maintain the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limit.

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. Each semiannual compliance report shall identify the following: (40 CFR 63.4520, 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f), 40 CFR 63.10(d))
 - a. The company name, responsible official, which coating operation(s) used each compliance option.
 - b. If there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating operations were in compliance.
 - c. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for the emission capture system and RTO.
 - d. If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified in 40 CFR 63.4520(c).

COMPLIANT MATERIALS OPTION

5. If the permittee uses emission limitations by using the compliant material option, the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a) is a deviation that must be reported as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5). **(40 CFR 63.4542(b))**

EMISSION RATE WITHOUT ADD-ON CONTROLS OPTION

6. For the emission rate without add-on controls, if the organic HAP emission rate for any 12-month rolling time period exceeds the applicable emission limits, the permittee shall report this as a deviation as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6). (40 CFR 63.4552(b))

EMISSION RATE WITH ADD-ON CONTROLS OPTION

- 7. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(7):
 - a. The organic HAP emission rate for any 12-month rolling time period exceeds the applicable emission limit; (40 CFR 63.4563(b))
 - b. An operating parameter is out of the allowed range; (40 CFR 63.4563(c)(1))
 - c. If an operating parameter deviates from the operating limit specified in 40 CFR Part PPPP, Table 1, then the permittee must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless the permittee has other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the District Supervisor; and/or (40 CFR 63.4563(c)(2))
 - d. Deviations from work practice standards. (40 CFR 63.4563(e))
- 8. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3), 40 CFR 63.4510(a))
- 9. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor of the test date no less than 7 days prior to the test date. (R 336.2001(4), 40 CFR 63.4510(a))
- 10. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5), 40 CFR 63.4510(a))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

- When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by EUFASCIA-LINE. The work practice plan shall specifiy practices and procedures to ensure at a minimum the following elements are implemented:
 - a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers. (40 CFR 63.4493(b)(1))
 - b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized. (40 CFR 63.4493(b)(2))

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- c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials and waste materials must be conveyed from one location to another in closed containers or pipes. (40 CFR 63.4493(b)(3))
- d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents. (40 CFR 63.4493(b)(4))
- e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment. (40 CFR 63.4493(b)(5))

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the AQD in accordance with 40 CFR 63.6(g). (40 CFR 63.4493(c))

- 2. The permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3) for EUFASCIA-LINE. This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the RTO. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures. (40 CFR 63.4500(c))
- 3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products. (40 CFR, Part 63, Subparts A and PPPP)

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Units: EUCOLDCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Fallinmont	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Fallinment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

1. The permittee shall not use cleaning solvents containing more than 5% by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (**R 336.1213(2**))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))
- 2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(h))
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
- 3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))

- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 °F, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
 - c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20%, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGRULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

Emission Unit: EURULE290

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

- Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. (R 336.1290(a)(i))
- Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(a)(ii))
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. (R 336.1290(a)(ii)(A))
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(a)(ii)(B))
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(a)(ii)(C))
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (**R 336.1290(a)(ii)(D)**)

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- Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: (R 336.1290(a)(iii))
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(a)(iii)(A))
 - b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. (R 336.1290(a)(iii)(B))
 - c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(a)(iii)(C))

II. MATERIAL LIMIT(S)

Material Limit	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)

IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. (R 336.1213(3))
 - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. (R 336.1213(3))
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). (R 336.1213(3))
 - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. (R 336.1213(3), R 336.1290(c))
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. (R 336.1213(3))
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(b), R 336.1213(3))
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (R 336.1213(3))

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3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. (R 336.1213(3))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE287(c) FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c). This includes the quality control lab spray booth, Asset # AM3800.

Emission Unit: EUAM3800

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Materia	l Lin	it Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coating	s 20 gallo	minus water per	NA	SC VI.1	R 336.1287(c)(i)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Any exhaust system that serves only coating spray equipment shall be equipped with a properly installed and operating particulate control system. (R 336.1287(c)(ii))

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 287(c); Permit to Install Exemption Record form (EQP 3562) or an alternative format that is approved by the AQD District Supervisor. (R 336.1213(3))
 - a. Volume of coating used, as applied, minus water, in gallons. (R 336.1287(c)(iii))
 - b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. (R 336.1213(3))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

admActual cubic feet per minuteMSDSMaterial Safety Data SheetBACTBest Available Control TechnologyMWMegawattsBTUBritish Thermal UnitNANot Applicable'CDegrees CelsiusNAAQSNational Ambient Air Quality StandardsCAAFederal Clean Air ActNBSHAPNational Emission Standard for Hazardous Air PollutantsCAMCompliance Assurance MonitoringNMCCNor-methane Organic CompoundsCEMContinuous Emission MonitoringNMCCNor-methane Organic CompoundsCEMCode of Federal RegulationsNSPSNew Source Performance StandardsCOMContinuous Opacity MonitoringNSRNew Source Performance StandardsCOMContinuous Opacity MonitoringPM1Particulate Matter fees than 10 microns in diameterdepartmentItchiyan Department of Environmental QualityPM1Particulate Matter fees than 10 microns in diameterdscmDy standard cubic footppmPatts per million by weightEPAUnited States Environmental Protection AgencyppmPatts per million by weight'FDegrees FahrenheitpomPatts per million by weight'FDegrees FahrenheitpsiPounds per square inch absoluteGCGGolton of Applied Coating SolidspsiPounds per square inch absoluteGCGeneral ContiniopsiPounds per square inch absoluteGCGeneral ContinionpsiPounds per square inch absoluteGCGalton of Applied Coating Solids	AQD	Air Quality Division	MM	Million
BTUBritish Thermal UnitNANA AQSNational Ambient Air Quality Standards"CDegrees CelsiusNAAQSNational Ambient Air Quality StandardsCAAFederal Clean Air ActNESHAPNational Ambient Air Quality StandardsCAMCompliance Assurance MonitoringNMCNormethane Organic CompoundsCEMContinuous Emission MonitoringNOXOxides Of NitrogenCFRCode of Federal RegulationsNSPNew Source ReviewCOMContinuous Opacity MonitoringPMParticulate MatterdepartmentMichigan Department of Environmental QualityPM-10Particulate MatterdepartmentMichigan Department of Environmental QualityPMParticulate MatterdepartmentStandard cubic footpphPound per hourdscmDry standard cubic footppmParts per million by volumeEPAUnited States Environmental Protection AgencyppmParts per million by volumeEVEmission UnitppmParts per million by volumeGCGeneral ConditionpsiaPounds per square inch absoluteGCGeneral Condition SolidspsiaPounds per square inch absoluteGCGeneral ConditionpsiaPounds per square inch agueggrGrainsPeTEPermanent Total EnclosureHAPHazardous Air PollutantPCReavable Operating PermitHAPHazardous Air PollutantSCSpecial ConditionHAPHazardous Air PollutantSCSpecial Conditi	acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
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mg Milligram yr Year	MDEQ	Michigan Department of Environmental Quality	VOC	Volatile Organic Compounds
	mg	Milligram	yr	Year
	-		%	Percent

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Progress Reports

The permittee shall submit Certified Progress Reports to the appropriate AQD District Supervisor using the MDEQ, AQD, Report Certification form (EQP 5736). Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor. **(R 336.1213(4)(b))**

Progress reports shall contain the following information:

The projected dates for achieving scheduled activities, milestones or compliance as required in the schedule of compliance. (R 336.1213(4)(b)(i))

The actual dates that the activities, milestones, or compliance are achieved. (R 336.1213(4)(b)(i))

An explanation of why any dates in the schedule of compliance were not or will not be met. (R 336.1213(4)(b)(ii))

A description of any preventative or corrective measures adopted in order to ensure that the schedule of compliance is met. (R 336.1213(4)(b)(ii))

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

The permittee shall use the current approved formats and procedures for the recordkeeping requirements referenced in EUFASCIA-LINE and EUDBOOTH-4698. Alternative formats must be approved by the AQD District Supervisor.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-A5764-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI- A5764-2009 is being reissued as Source-Wide PTI No. MI-PTI-A5764-2015

Permit to	ROP Revision	Description of Equipment or Change	Corresponding
Install	Application		Emission Unit(s) or
Number	Number		Flexible Group(s)
NA	201000007	Remove references to the Waterborne Paint Booth which is being dismantled from EURULE290. Add references to the Area D Service paint booths for a drying oven to EUDBOOTH-3655. The drying oven is being relocated from the Waterborne Paint Booth area to the Area D Service area.	EUDBOOTH-3655 EURULE290

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-A5764-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
87-15	201500088/ August 25, 2015	Incorporate Permit to Install (PTI) No. 87-15. PTI No. 87-15 is to incorporate facility-wide VOC emission limits to less than the Part 18 (PSD) threshold. The PTI also makes some physical changes to EUFASCIA-LINE.	FGFACILITY FGMISC-PLANT EUFASCIA-LINE EUNORTH-C-LINE EUDBOOTH-4698
NA	201600158/ December 5, 2016	Update the CAM Conditions to incorporate the upper and lower limits for the inlet static pressure, and update the static pressure excursion limit based on performance testing results.	EUFASCIA-LINE
NA	201800072 / August 2, 2018	Remove EUNORTH-C-LINE from the ROP, since it was dismantled and removed from the facility. FGMISC-PLANT was changed to EUDBOOTH- 4698, since it was the only emission unit covered in the Flexible Group.	EUNORTH-C-LINE FGMISC-PLANT FGMACT-PPPP

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in **EUFASCIA-LINE**.

VOC emissions in pounds per calendar day (after control):

Coating usage (gallons/calendar day) X VOC content (pounds VOC/gallon of coating) X [100% - VOC control efficiency] = Controlled VOC emissions (pounds per calendar day)

VOC emissions in pounds per hour:

Coating usage (gallons/hour)* **X** VOC content (pounds VOC/gallon of coating) **X** [100% - VOC control efficiency] = Controlled VOC emissions (pounds per hour)

*From records of daily usage and hours of operation.

VOC control efficiency:

VOC Control Efficiency (%) = VOC Capture Efficiency* (%) X VOC Destruction Efficiency* (%) * as determined by most recent stack testing

VOC emissions in tons per month:

Coatings (gallons/month) **X** VOC content (pounds VOC/gallon of coating) **X** [100% - VOC control efficiency] *I* 2000 pounds/ton = Controlled VOC emissions (tons/month)

VOC emissions in tons per year based on a 12-month rolling time period:

VOC emissions/current month (tons) + VOC emissions/previous 11 months (tons) = VOC emissions (tons/ 12 month rolling time period.

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUDBOOTH-4698.

VOC emissions in tons per month:

Coatings, clean-up, and miscellaneous solvents (gallons/month) **X** VOC content (pounds VOC/gallon of coating, clean-up, misc. solvent) **/** 2000 pounds/ton = VOC emissions (tons/month)

VOC emissions in tons per year based on a 12-month rolling time period:

VOC emissions/current month (tons) + VOC emissions/previous 11 months (tons) = VOC emissions (tons/ 12 month rolling time period.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.