

From: [Jarrett, Stephanie](#)
To: [EGLE-ROP](#)
Cc: [Kallumkal, Sebastian \(EGLE\)](#); [Nino Nuculovic](#)
Subject: B2363 – ROP Renewal Application (Standard Coating)
Date: Friday, November 10, 2023 2:30:14 PM
Attachments: [ROP Renew StdCoat 2023 1109 FNL.pdf](#)

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Please find the ROP Renewal Application for the facility identified below attached to this email.

Standard Coating Inc.
32565 Dequindre Rd.
Madison Heights, Michigan
SRN B2363

Application documents (including application forms, and supporting documentation) for ROP No. MI-ROP-**B2363-2019** are attached to this email. An administratively complete application is due no later than **12/7/2023**. A hard copy of the application with original signature will be delivered to the Southeast Michigan District Office. If you have questions or problems opening the attached files, please contact me.

Thanks,
Stephanie

Stephanie A. Jarrett, P.E. | Senior Environmental Engineer
Fishbeck | w: 248.324.2146 | c: 248.417.9425 | Fishbeck.com

November 9, 2023
Project No. 231463

Joyce Zhu
District Supervisor
Michigan Department of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, MI 48092

ROP Renewal Application
Standard Coating Inc., Madison Heights, Michigan
SRN B2363

Fishbeck has prepared a Title V Renewable Operating Permit (ROP) Renewal Application for Standard Coating Inc., located at 32565 Dequindre Road, Madison Heights, Michigan (ROP No. MI-ROP-B2363-2019). The Renewal Application is due no later than December 7, 2023.

This Renewal Application includes:

- EGLE ROP Application Form EQP 6000
- EGLE ROP Application Additional Information Form AI-001
- A marked up copy of MI-ROP-B2363-2019
- Criteria pollutant potential to emit (PTE) calculations
- Hazardous air pollutant PTE calculations

An electronic copy of the application and supporting documents will be provided to EGLE, which reduces the EGLE application administrative completeness review to 15 days.

If you have any questions or require additional information, please contact me at 248.324.2146 or sajarret@fishbeck.com.

Sincerely,



Stephanie Jarrett
Senior Environmental Engineer

By email and UPS

Copy: Nino Nuculovic – Standard Coating (by email only)



RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V”, then “ROP Forms & Templates”).

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN B2363	SIC Code 2592	NAICS Code 332813	Existing ROP Number MI-ROP-B2363-2019	Section Number (if applicable)
Source Name Standard Coating Inc.				
Street Address 32565 Dequindre Road				
City Madison Heights		State MI	ZIP Code 48071	County Oakland
Section/Town/Range (if address not available)				
Source Description Standard Coating Inc. conducts finishing of various automobile parts and fasteners.				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

OWNER INFORMATION

Owner Name Standard Coating Inc.	Section Number (if applicable)			
Mailing address (<input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country

Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name Nino Nuculovic		Title VP of Operations		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address)				
City	State	City	State	City
Phone number 586.255.1656		E-mail address nnuculovic@standardcoatinginc.com		

Contact 2 Name (optional) Stephanie Jarrett		Title Senior Environmental Engineer		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address) Fishbeck; 39500 MacKenzie Drive, Suite 100				
City Novi	State MI	City Novi	State MI	City Novi
Phone number 248.324.2146		E-mail address sajarrett@fishbeck.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name Jeff Mertz		Title Owner		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address)				
City	State	City	State	City
Phone number 248.416.4177		E-mail address jmertz@standardcoatinginc.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

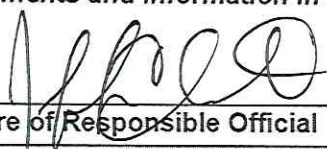
<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID: AI-

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.	
<input checked="" type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	<input checked="" type="checkbox"/> Compliance Plan/Schedule of Compliance
<input checked="" type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required)	<input checked="" type="checkbox"/> Stack information
<input type="checkbox"/> Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	<input type="checkbox"/> Acid Rain Permit Initial/Renewal Application
<input checked="" type="checkbox"/> Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Confidential Information
<input type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	<input checked="" type="checkbox"/> Paper copy of all documentation provided (required)
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input checked="" type="checkbox"/> Electronic documents provided (optional)
<input type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input type="checkbox"/> Other, explain:

Compliance Statement	
This source is in compliance with <u>all</u> of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.	
If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.	

Name and Title of the Responsible Official (Print or Type)	
Jeff Mertz, Owner	
<i>As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.</i>	
	11/9/2023
Signature of Responsible Official	Date

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from all emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
C4.	Has this stationary source added or modified equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NO _x , PM ₁₀ , PM _{2.5} , SO ₂ , VOC, lead) emissions? If Yes , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No , criteria pollutant potential emission calculations do not need to be included.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C5.	Has this stationary source added or modified equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes , then a copy must be submitted as part of the ROP renewal application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/>	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI- Compliance Plan and AI-PTE	

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. Yes No
 If No, go to Part G.

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. Yes No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. Yes No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identify the stack(s) that were not reported on the applicable MAERS form(s). Yes No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. Yes No

Comments:

Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H6. Does the source propose to add, change and/or delete source-wide requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H7. Are you proposing to streamline any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete emission limit requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H9. Does the source propose to add, change and/or delete material limit requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H10. Does the source propose to add, change and/or delete process/operational restriction requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H11. Does the source propose to add, change and/or delete design/equipment parameter requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H12. Does the source propose to add, change and/or delete testing/sampling requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H13. Does the source propose to add, change and/or delete monitoring/recordkeeping requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H14. Does the source propose to add, change and/or delete reporting requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID:
AI-Mark-up



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B2363

Section Number (if applicable):

1. Additional Information ID

AI-MARKUP

Additional Information

2. Is This Information Confidential?

Yes No

A marked up copy of MI-ROP-B2363-2019 is attached.

No Changes are being requested.

Page of

KEEP ALL CONDITIONS – NO CHANGES, ADDITIONS, OR DELETIONS
MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION

EFFECTIVE DATE: June 7, 2019

ISSUED TO

Standard Coating Inc.

State Registration Number (SRN): B2363

LOCATED AT

32565 Dequindre Road, Madison Heights, Michigan 48071

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2363-2019

Expiration Date: June 7, 2024

Administratively Complete ROP Renewal Application
Due Between December 7, 2022 and December 7, 2023

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 Rule 210(1) of the administrative rules promulgated under Act 451, 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-B2363-2019

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, 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 Environment, Great Lakes, and Energy

Joyce Zhu, Warren District Supervisor

TABLE OF CONTENTS

AUTHORITY AND ENFORCEABILITY	3
A. GENERAL CONDITIONS	4
Permit Enforceability	4
General Provisions	4
Equipment & Design	5
Emission Limits	5
Testing/Sampling	5
Monitoring/Recordkeeping	6
Certification & Reporting	6
Permit Shield	7
Revisions	8
Reopenings	8
Renewals	9
Stratospheric Ozone Protection	9
Risk Management Plan	9
Emission Trading	9
Permit to Install (PTI)	10
B. SOURCE-WIDE CONDITIONS	11
C. EMISSION UNIT SPECIAL CONDITIONS	12
EMISSION UNIT SUMMARY TABLE	12
EULINE9	13
D. FLEXIBLE GROUP SPECIAL CONDITIONS	18
FLEXIBLE GROUP SUMMARY TABLE	18
FGBOILERS	19
E. NON-APPLICABLE REQUIREMENTS	23
APPENDICES	24
Appendix 1. Acronyms and Abbreviations	24
Appendix 2. Schedule of Compliance	25
Appendix 3. Monitoring Requirements	25
Appendix 4. Recordkeeping	25
Appendix 5. Testing Procedures	25
Appendix 6. Permits to Install	25
Appendix 7. Emission Calculations	25
Appendix 8. Reporting	26

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 Environment, Great Lakes, and Energy (EGLE) 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 is 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 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.

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

1. 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))**
2. 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))**

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% 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 state 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 60604-3507. **(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(9))**

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 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):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - 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, EGLE.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, EGLE, 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.

C. EMISSION UNIT SPECIAL 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
EULINE9	Surface coating line, includes a phosphate pretreatment system, rinsing process and coating process with two dip tanks and natural gas-fired curing oven.	11/01/1996	NA
EUBOILER2	Natural gas fired boiler (4.2 MMBTU/HR)	1976	FGBOILERS
EUBOILER5	Natural gas fired boiler (8.4 MMBTU/HR)	1975	FGBOILERS

**EULINE9
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Surface coating line, includes a phosphate pretreatment system, rinsing process, and coating process with two dip tanks and natural gas-fired curing oven.

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
1. VOC	8.0 pounds ²	Hourly	EULINE9	Section V and Section VI	R 336.1225
2. VOC	34.9 tons ²	Annually based upon a 12-month rolling time period as determined at the end of each month	EULINE9	Section V and Section VI	R 336.1702
3. Organic HAP	2.6 pounds per gallon of coating solids	12-month rolling time period as determined at the end of each month	EULINE9 when using General Use Coating	SC VI. 4 – VI.8	40 CFR 63.3890(b)(1)
4. Organic HAP	27.5 lbs. per gal of coating solids	12-month rolling time period as determined at the end of each month	EULINE9 when using High Performance Coating	SC VI. 4 – VI.8	40 CFR 63.3890(b)(2)
5. Organic HAP	1.0 lbs. per gal of coating solids	12-month rolling time period as determined at the end of each month	EULINE9 when using Magnet Wire Coating	SC VI. 4 – VI.8	40 CFR 63.3890(b)(3)
6. Organic HAP	37.7 lbs. per gal of coating solids	12-month rolling time period as determined at the end of each month	EULINE9 when using Rubber-to-Metal Coating	SC VI. 4 – VI.8	40 CFR 63.3890(b)(4)
7. Organic HAP	12.4 lbs. per gal of coating solids	12-month rolling time period as determined at the end of each month	EULINE9 when using Extreme Performance Fluoropolymer Coating	SC VI. 4 – VI.8	40 CFR 63.3890(b)(5)

8. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(a) through (c):
- 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 63.3891)**

9. Any coating operation using the compliant material option or the emission rate without add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.3890 at all time. **(40 CFR 63.3900(a)(1))**
10. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.3890(a) or (b), the permittee may comply separately with each subcategory emission limit or comply using one of the alternatives in 40 CFR 63.3890(c)(1) or (2). **(40 CFR 63.3890(c))**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Water-based coating VOC content	1.3 pounds per gallon of coating (minus water as applied) ²	Instantaneous	EULINE9	SC VI.1 SC VI.2 SC VI.3	R 336.1702
2. Each thinner and /or additive	No organic HAP*	Continuous	EULINE9 when using Compliant Material Option	SC VI.4 SC VI.5 SC VI.6 SC VI.8	40 CFR 63.3891(a)
3. Each Cleaning material	No Organic HAP*	Continuous	EULINE9 when using Compliant Material Option	SC VI.4 SC VI.5 SC VI.6 SC VI.8	40 CFR 63.3891(a)

* Determined according to 40 CFR 63.3941(a)

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))**

1. Monthly testing of coating, as applied, using Method 24 analysis or an alternative method approved by the District Supervisor.² **(R 336.1702)**

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 a current listing of the chemical composition of each coating, reducer, resin feed, pigment paste and cleaner, based upon manufacturer's formulation data, Material Safety Data Sheets, or both, including the weight percentage of each compound.² **(R 336.1225, R 336.1702, R 336.1901)**
2. The permittee shall keep a separate record for each calendar month of the following:
 - a. Number of gallons (including water) of each material used
 - b. Densities of coatings (lb/gal) including water
 - c. VOC Content (Wt-% or lb/gal) of each material including water, as received
 - d. VOC content in lb/gal of coating, minus water, as applied
 - e. Monthly reducer usage in gallons (if any)
 - f. VOC content of reducer in lb/gal

- g. Number of operating hours, based upon days of operation² **(R 336.1702, R 336.1901)**
3. The permittee shall calculate the following for each calendar month, using the method detailed in Appendix 7, or an alternate method approved by the District Supervisor:
 - a. Average hourly VOC emission rate in lb/hr
 - b. A calendar month VOC emission rate in tons per month
 - c. Annual VOC emission rate, based on a 12-month rolling time period, in tons per year² **(R 336.1702, R 336.1901)**
4. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. **(40 CFR 63.3940, 40 CFR 63.3950, and 40 CFR 63.3960)**
5. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931. **(40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j))**
6. The permittee shall maintain, at a minimum, the following records for each compliance period:
 - a. A copy of each notification and report that is submitted to comply with Subpart M, and the documentation supporting each notification and report. **(40 CFR 63.3930(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 volume fraction of coating solids for each coating. **(40 CFR 63.3930(b))**
 - c. 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 63.3930(c)(1))**
 - d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941. **(40 CFR 63.3930(c)(2))**
 - e. 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 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951. **(40 CFR 63.3930(c)(3))**
 - f. 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 volume used. **(40 CFR 63.3930(d))**
 - g. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight. **(40 CFR 63.3930(e))**
 - h. The volume fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.3930(f))**
 - i. For either the emission rate without add-on controls option, the density of for each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(g))**
 - j. The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 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 63.3951(e)(4). **(40 CFR 63.3930(h))**
 - k. The date, time, and duration of each deviation. **(40 CFR 63.3930(j))**

7. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.3890, for each compliance period, using Equation 2 of 40 CFR 63.3941. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.3941(a). **(40 CFR 63.3942)**
8. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to 40 CFR 63.3951(a) through (g). **(40 CFR 63.3952)**

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. 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 all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify the compliance option used for each coating operation(s) during the reporting period. If there were no deviations from the emission limitations in SC I.3. through SC I.7, the semi-annual report shall include a statement that there were no deviations from the emission limitations during the reporting period. **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), and 40 CFR 63.3963(f))**
5. For the compliant material option; the permittee shall report as a deviation any instance a coating used during any 12-month compliance period exceeds the applicable emission limit specified in SC I.3. through SC I.7 or any thinner or cleaning material used contains any organic HAP. **(40 CFR 63.3942(b), 40 CFR 63.3910(c)(6), 40 CFR 63.3920(a)(5))**
6. When using the emission rate without add-on controls, the permittee shall report as a deviation when the organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in SC I.3. through SC I.7. **(40 CFR 63.3952(b), 40 CFR 63.3910(c)(6), 40 CFR 63.3920(a)(6))**
7. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910. **(40 CFR Part 63, Subparts A and MMMM)**

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 Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
-----------------	--	------------------------------------	------------------------------------

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVL90 (Oven)	24 ²	28 ²	R 336.1225 R 336.1901 R 336.2803 R 336.2804 40 CFR 52.21 (c) and (d)
2. SVL91 (Tank 1)	18 ²	28 ²	R 336.1225 R 336.1901 R 336.2803 R 336.2804 40 CFR 52.21 (c) and (d)
3. SVL92 (Tank 2)	18 ²	27 ²	R 336.1225 R 336.1901 R 336.2803 R 336.2804 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

1. 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 M for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date. **(40 CFR Part 63, Subparts A and M)**

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).

D. FLEXIBLE GROUP SPECIAL 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
FGBOILERS	Requirements for existing Gas 1, (Natural Gas only) Boilers and Process Heaters at major sources of Hazardous Air Pollutants.	EUBOILER2 EUBOILER5

FGBOILERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for existing Gas 1, (Natural Gas only) Boilers and Process Heaters at major sources of Hazardous Air Pollutants.

Emission Unit: EUBOILER2, EUBOILER5

The collection at a major source of all existing industrial, commercial, and institutional boilers and process heaters within the units designed to burn gas 1 fuel subcategory as defined in 40 CFR 63.7575. At the time of permit renewal:

Less than or equal to 5 MMBtu/hr	EUBOILER2
Greater than 5 MMBtu/hr and less than 10 MMBtu/hr	EUBOILER5
Equal to or greater than 10 MMBtu/hr	NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall only burn natural gas as defined in 40 CFR 63.7575. **(40 CFR 63.7499(I))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the tune-up and one-time energy assessment work practice standards in Tables 1 through 3 and 11 through 13 of 40 CFR 63 Subpart DDDDD that apply to each emission unit in FGBOILERS. **(40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)**
2. The permittee must operate and maintain affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that 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 source. **(40 CFR 63.7500(a)(3))**
3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. **(40 CFR 63.7500(b))**
4. The permittee shall complete a tune-up every 5 years (61 months) for EUBOILER2. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**
5. The permittee shall complete a tune-up every 2 years (25 months) for EUBOILER5. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**

6. The permittee shall follow the procedures described in SC IX 4.a through 4.f for all initial and subsequent tune ups. **(40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)**
7. If a unit in FGBOILERS is not operating on the required date for a tune-up, they permittee shall conduct the tune-up within 30 calendar days of startup of the unit. **(40 CFR 63.7540(a)(13))**
8. The permittee shall complete the Initial tune ups on all units in FGBOILERS no later than January 31, 2016, except as provided in **40 CFR 63.7510(j)** and **40 CFR 63.7540(a)(13)**.
9. The permittee must complete the one-time energy assessment no later than January 31, 2016. **(40 CFR 63.7510(e))**

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 must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting SC IX. 4. and any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**
2. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining three years. **(40 CFR 63.7560(a), (b), and (c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. 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 must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60th day following the completion of the initial compliance demonstrations for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following information and must be submitted within 60 days of January 31, 2016. **(40 CFR 63.7545(e))**
 - a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. **(40 CFR 63.7545(e)(1))**
 - b. Certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR 63.7545(e)(8))**

- i. "This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR Part 63, Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi)." **(40 CFR 63.7545(e)(8)(i))**
 - ii. "This facility has had an energy assessment performed according to 40 CFR 63.7530(e)." **(40 CFR 63.7545(e)(8)(ii))**
5. The permittee shall submit a biennial compliance report for EUBOILER5 and a five-year compliance report for EUBOILER2, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below: **(40 CFR 63.7550(b))**
 - a. The first compliance report for EUBOILER5 must cover the period beginning on January 31, 2016 and ending on December 31 within two years after January 31, 2016. The first compliance report for EUBOILER2 must cover the period beginning on January 31, 2016 and ending on December 31 within five years after January 31, 2016. **(40 CFR 63.7550(b)(1))**
 - b. The first compliance report must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(2), 40 CFR 63.7550(b)(5))**
 - c. Each subsequent compliance report must cover the applicable 2 and 5-year periods from January 1 to December 31. **(40 CFR 63.7550(b)(3))**
 - d. Biennial and 5-year compliance reports must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(4), 40 CFR 63.7550(b)(5))**
6. The permittee must include the following information in the compliance report. **(40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))**
 - a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
 - b. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**
 - c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
 - d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a five-year period and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**
 - e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**
7. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below. **(40 CFR 63.7550(h))**
 - a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90-days after the form becomes available in CEDRI. **(40 CFR 63.7550(h)(3))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, for existing boilers and process heaters, unless an extension has been granted per 40 CFR 63.6(i). **(40 CFR 63.7495(b))**
2. The permittee must be in compliance with the applicable work practice standards. **(40 CFR 63.7505(a))**

3. For any emission unit in FGBOILERS that has not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. **(40 CFR 63.7515(g))**
4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: **(40 CFR 63.7540(a))**
 - a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.7540(a)(10)(iii))**
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
 - f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below. **(40 CFR 63.7540(a)(10)(vi))**
 - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
 - ii. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**
5. The permittee must keep records of to demonstrate continuous compliance with the tune-up requirement.
6. The permittee may delay the burner inspection specified in SC IX 4.a for EUBOILER2 until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every five years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. **(40 CFR 63.7540(a)(12))**

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).

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. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 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))

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

Specific recordkeeping requirement formats and procedures 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 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-B2363-2014. 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- B2363-2014 is being reissued as Source-Wide PTI No. MI-PTI- B2363-2019.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201800131*	Administrative Amendment for change in Ownership from Howard Finishing LLC to Standard Coating, Inc.	NA

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 EULINE9.

Month/year:

Date	Hours of Operation	Coating ID	A Gallons used (with water)	B Coating density, lbs per gallon (with water)	C Percent VOC, lbs VOC per 100 lbs coating (with water)	D = B x C/100 Lbs VOC per gallon (with water)	E=AxD Lbs of VOC	F=See note Lbs VOC per gallon (minus water)

Total pounds emitted this month = G = Sum of all E's

Average hourly emissions in pound per hour = H = G / total hours

Total tons VOC's emitted this month = J = G/2000

Total tons emitted 11 previous months = K

Total tons emitted 12-month rolling period = L = J+K

Limit 12 month rolling period, tons/yr = M **L may = M or < M**

G	
H	
J	
K	
L	
M	34.9

NOTES:
$$F = \frac{B \times \left(\frac{wt\%VOC}{100} \right)}{\left[1 - \left(\frac{B \times wt\%water}{8.34 \times 100} \right) \right]}$$

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use EGLE, AQD, Report Certification form (EQP 5736) and EGLE, 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.



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B2363

Section Number (if applicable):

1. Additional Information ID
AI-Compliance Plan

Additional Information

2. Is This Information Confidential?

Yes No

During the 2023 inspection, a complete Energy Assessment could not be located, although the Inspection Report references submittal of the assessment. The AQD inspector indicated that the facility was in non-compliance of the Energy Assessment Requirements, therefore, we are indicated non-compliance with the ROP.

The Compliance Plan is to conduct an Energy Assessment. Standard Coating has selected a firm to conduct the energy assessment and it will be completed by January 31, 2024. As the assessment will be completed within 3 months of the ROP Renewal Application submittal date, quarterly updates on progress will not be required. If scheduling or delays occur, Standard Coating will notify AQD.

Page of



RENEWABLE OPERATING PERMIT APPLICATION

AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B2363

Section Number (if applicable):

1. Additional Information ID

AI-PTE

Additional Information

2. Is This Information Confidential?

Yes No

Standard Coating added a small internally-vented Powder Coat Line. The Powder Coat Line is equipped with high efficiency particulate air (HEPA) filters. Because the Powder Coat Line is internally-vented, particulate emissions are expected to be negligible. PTE from the E-Coat line and combustion sources are attached.

Page of

Table 1 – Potential Emission Summary

Renewable Operating Permit Renewal Application (SRN B2363)

Standard Coating Inc., Madison Heights, Michigan

Pollutant	EULINE9 - Coating Annual Potential Emissions (tpy)	EULINE9 - Combustion Annual Potential Emissions (tpy)	EUBOILER2 Annual Potential Emissions (tpy)	EUBOILERS5 Annual Potential Emissions (tpy)	EUNatGasHeaters Annual Potential Emissions (tpy)	Combined Annual Potential Emissions (tpy)	PSD Major Source Threshold
CO	-	0.7	1.8	3.0	1.4	7.0	250
NO _x	-	0.9	2.1	3.6	1.7	8.3	250
PM	-	0.0	0.04	0.1	0.03	0.2	250
PM ₁₀	-	0.1	0.2	0.3	0.1	0.6	250
PM _{2.5}	-	0.1	0.2	0.3	0.1	0.6	250
SO ₂	-	0.0	0.01	0.02	0.01	0.05	250
VOC	34.9	0.0	0.1	0.2	0.1	0.5	250
CO ₂	-	1,025	2,562	4,304	2,011	9,902	See CO ₂ e
CH ₄	-	0.02	0	0	0	0	
N ₂ O	-	0.00	0	0	0	0	
CO ₂ e	-	1,026	2,564	4,308	2,013	9,912	NA
Lead	-	0.000	0.000	0.000	0.000	0.00	NA
Fluorides	-	-	-	-	-	-	NA
H ₂ S	-	-	-	-	-	-	NA
H ₂ SO ₄	-	-	-	-	-	-	NA
Highest Single HAP (XXXX)	*	3.03E-02	3.86E-02	6.49E-02	3.03E-02	*	NA
Aggregate HAPs	*	3.18E-02	4.05E-02	6.81E-02	3.18E-02	*	NA

*Standard Coating does not have a HAP limit associated with EULINE9. However, the VOC limit is 34.0 tpy; therefore, it can reasonably be assumed that the volatile HAPs cannot exceed 34.9 tpy.

Table 2 - NSR Regulated Pollutant Potential Emissions - Combustion Sources

Renewable Operating Permit Renewal Application (SRN B2363)
 Standard Coating Inc., Madison Heights, Michigan

		EUBOILER2	EUBOILERS5	EULINE9 (oven)	EUNatGasHeaters ⁴
Heat Input Capacity	MMBtu/hr	5.0	8.4	2.0	3.9
Heat Input Capacity	MMcf/hr	0.0049	0.0082	0.0020	0.0038
Annual Operating Hours	hr/yr	8,760	8,760	8,760	8,760
Annual Heat Input Limit or Capacity	MMBtu/yr	43,800	73,584	17,520	34,386
Fuel Heat Value	MMBtu/MMcf	1,020	1,020	1,020	1,020
Number of Identical Units		1	1	1	1

NSR Regulated Pollutant	Emission Factor (See Notes)	Notes	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)
CO	84 lb/MMCF	1	1.8	3.0	0.7	1.4
NO _x	100 lb/MMCF	1	2.1	3.6	0.9	1.7
PM	1.9 lb/MMCF	1	0.04	0.1	0.0	0.03
PM ₁₀	7.6 lb/MMCF	1	0.2	0.3	0.1	0.1
PM _{2.5}	7.6 lb/MMCF	1	0.2	0.3	0.1	0.1
SO ₂	0.6 lb/MMCF	1	0.01	0.02	0.01	0.01
VOC	5.5 lb/MMCF	1	0.1	0.2	0.0	0.1
CO ₂	53.06 kg/MMBtu	2	2,562	4,304	1,025	2,011
CH ₄	1.00E-03 kg/MMBtu	2	0	0	0	0
N ₂ O	1.00E-04 kg/MMBtu	2	0	0	0	0
CO ₂ e	53.11 kg/MMBtu	2	2,564	4,308	1,026	2,013
Lead	5.00E-04 lb/MMCF	3	1.07E-05	1.80E-05	4.29E-06	8.43E-06
Fluorides						
H ₂ S						
H ₂ SO ₄						

¹ Emission factors are from Web-fire for SCC 1-02-006-03 for a Boiler with a heat input capacity of less than 10 MMBtu/hr.

² CO₂e global warming potential and emission factors obtained from 40 CFR 98 Subparts A and C, respectively. The global warming potential for CH₄ (25) and N₂O (298) are consistent with the USEPA published changes on November 29, 2013.

³ Emission factors are from Web-fire for SCC 1-02-006-02 for a Boiler with a heat input capacity of greater than 10 MMBtu/hr.

⁴ EUNatGasHeaters is comprised of exempt miscellaneous natural gas ceiling-mounted radiant heaters: 20 heaters at 0.1 MMBtu/hr; 30 heaters at 0.06 MMBtu/hr; and 1 heater at 0.1253 MMBtu/hr. Total heat input rating is 3.9 MMBtu/hr. Oven BTUs assumed to be no more than 2 MMBtu/hr

Emission Calculation Methods

Using lb/MMCF Emission Factors

$$E_{ST} = C_{MMCF} \times EF_{MMCF}$$

Using kg/MMBtu Emission Factors

$$E_{ST} = C_{HI} \times 2.20462 \text{ lb/kg} \times EF_{ka}$$

$$E_A = E_{ST} \times \text{Annual Operating Hours} / 2,000 \text{ lb/ton}$$

where:

- E_{ST} = Short Term Emissions (lb/hr);
- E_A = Annual Maximum Emissions (tpy);
- C_{MMCF} = Max Fuel Usage (MMCF/hr); and
- EF_{MMCF} = emission factor (lb/MMCF)
- C_{HI} = Heat Input Capacity (MMBtu/hr); and
- EF_{ka} = emission factor (kg/MMBtu)

Table 3 - HAP Potential Emissions - Combustion Sources

Renewable Operating Permit Renewal Application (SRN B2363)
 Standard Coating Inc., Madison Heights, Michigan

		EUBOILER2	EUBOILERS	EULINE9 (oven)	EUNatGasHeaters ²
Heat Input Capacity	MMBtu/hr	5.0	8.4	2.0	3.9
Heat Input Capacity	MMcf/hr	0.0049	0.0082	0.0020	0.0038
Annual Operating Hours	hr/yr	8,760	8,760	8,760	8,760
Annual Heat Input Limit or Capacity	MMBtu/yr	43,800	73,584	17,520	34,386
Fuel Heat Value	MMBtu/MMcf	1,020	1,020	1,020	1,020
Number of Identical Units		1	1	1	1

Toxic Air Contaminant	CAS No.	Emission Factor (See Notes)	Notes	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)	HAP?
Formaldehyde	50-00-0	7.50E-02 lb/MMCF	1	1.61E-03	2.71E-03	6.44E-04	1.26E-03	Yes
Benzo (a) pyrene	50-32-8	1.20E-06 lb/MMCF	1	2.58E-08	4.33E-08	1.03E-08	2.02E-08	Yes
Dibenzo(a,h) anthracene	53-70-3	1.20E-06 lb/MMCF	1	2.58E-08	4.33E-08	1.03E-08	2.02E-08	Yes
3-Methylcholanthrene	56-49-5	1.80E-06 lb/MMCF	1	3.86E-08	6.49E-08	1.55E-08	3.03E-08	Yes
Benzo (a) anthracene	56-55-3	1.80E-06 lb/MMCF	1	3.86E-08	6.49E-08	1.55E-08	3.03E-08	Yes
Dimethylbenz(a)anthracene	57-97-6	1.60E-05 lb/MMCF	1	3.44E-07	5.77E-07	1.37E-07	2.70E-07	Yes
Benzene	71-43-2	2.10E-03 lb/MMCF	1	4.51E-05	7.57E-05	1.80E-05	3.54E-05	Yes
Acenaphthene	83-32-9	1.80E-06 lb/MMCF	1	3.86E-08	6.49E-08	1.55E-08	3.03E-08	Yes
Phenanthrene	85-01-8	1.70E-05 lb/MMCF	1	3.65E-07	6.13E-07	1.46E-07	2.87E-07	Yes
Fluorene	86-73-7	2.80E-06 lb/MMCF	1	6.01E-08	1.01E-07	2.40E-08	4.72E-08	Yes
Naphthalene	91-20-3	6.10E-04 lb/MMCF	1	1.31E-05	2.20E-05	5.24E-06	1.03E-05	Yes
2-Methyl Naphthalene	91-57-6	2.40E-05 lb/MMCF	1	5.15E-07	8.66E-07	2.06E-07	4.05E-07	Yes
Toluene	108-88-3	3.40E-03 lb/MMCF	1	7.30E-05	1.23E-04	2.92E-05	5.73E-05	Yes
N-Hexane	110-54-3	1.80E+00 lb/MMCF	1	3.86E-02	6.49E-02	1.55E-02	3.03E-02	Yes
Anthracene	120-12-7	2.40E-06 lb/MMCF	1	5.15E-08	8.66E-08	2.06E-08	4.05E-08	Yes
Pyrene	129-00-0	5.00E-06 lb/MMCF	1	1.07E-07	1.80E-07	4.29E-08	8.43E-08	Yes
Benzo (g,h,i) perylene	191-24-2	1.20E-06 lb/MMCF	1	2.58E-08	4.33E-08	1.03E-08	2.02E-08	Yes
Indeno(1,2,3-cd)pyrene	193-39-5	1.80E-06 lb/MMCF	1	3.86E-08	6.49E-08	1.55E-08	3.03E-08	Yes
Benzo (b) fluoranthene	205-99-2	1.80E-06 lb/MMCF	1	3.86E-08	6.49E-08	1.55E-08	3.03E-08	Yes
Fluoranthene	206-44-0	3.00E-06 lb/MMCF	1	6.44E-08	1.08E-07	2.58E-08	5.06E-08	Yes
Benzo (k) fluoranthene	207-08-9	1.80E-06 lb/MMCF	1	3.86E-08	6.49E-08	1.55E-08	3.03E-08	Yes
Acenaphthylene	208-96-8	1.80E-06 lb/MMCF	1	3.86E-08	6.49E-08	1.55E-08	3.03E-08	Yes
Chrysene	218-01-9	1.80E-06 lb/MMCF	1	3.86E-08	6.49E-08	1.55E-08	3.03E-08	Yes
Manganese	7439-96-5	3.80E-04 lb/MMCF	1	8.16E-06	1.37E-05	3.26E-06	6.41E-06	Yes
Mercury	7439-97-6	2.60E-04 lb/MMCF	1	5.58E-06	9.38E-06	2.23E-06	4.38E-06	Yes
Nickel	7440-02-0	2.10E-03 lb/MMCF	1	4.51E-05	7.57E-05	1.80E-05	3.54E-05	Yes
Arsenic	7440-38-2	2.00E-04 lb/MMCF	1	4.29E-06	7.21E-06	1.72E-06	3.37E-06	Yes
Beryllium	7440-41-7	1.20E-05 lb/MMCF	1	2.58E-07	4.33E-07	1.03E-07	2.02E-07	Yes
Cadmium	7440-43-9	1.10E-03 lb/MMCF	1	2.36E-05	3.97E-05	9.45E-06	1.85E-05	Yes

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Number of Identical Units		1	1	1	1

Toxic Air Contaminant	CAS No.	Emission Factor (See Notes)	Notes	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)	Potential Emissions per Unit (tpy)	HAP?
Chromium	7440-47-3	1.40E-03 lb/MMCF	1	3.01E-05	5.05E-05	1.20E-05	2.36E-05	Yes
Cobalt	7440-48-4	8.40E-05 lb/MMCF	1	1.80E-06	3.03E-06	7.21E-07	1.42E-06	Yes
Selenium	7782-49-2	2.40E-05 lb/MMCF	1	5.15E-07	8.66E-07	2.06E-07	4.05E-07	Yes
Total HAP PTE (tpy):				4.05E-02	6.81E-02	1.62E-02	3.18E-02	

¹ Emission factors are from Web-fire for SCC 1-02-006-02 because no TAC factors are available for SCC 1-02-006-03.

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$$E_A = E_{ST} \times \text{Annual Operating Hours} / 2,000 \text{ lb/ton}$$

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E_A = Annual Maximum Emissions (tpy);

C_{MMCF} = Max Fuel Usage (MMCF/hr); and

EF_{MMCF} = emission factor (lb/MMCF)