## MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY AIR QUALITY DIVISION

EFFECTIVE DATE: August 20, 2024

**ISSUED TO** 

**Hutchinson Antivibration Systems, Inc.** 

State Registration Number (SRN): E5094

LOCATED AT

460 Fuller Avenue NE, Grand Rapids, Kent County, Michigan 49503

## RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-E5094-2024

Expiration Date: August 20, 2029

Administratively Complete ROP Renewal Application Due Between February 20, 2028, and February 20, 2029

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-E5094-2024

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

Heidi Hollenbach	District	Supervisor
i iolai i iolioribaori	Diotriot	Capor vicoi

## **TABLE OF CONTENTS**

AUTHORITY AND ENFORCEABILITY	3
A. GENERAL CONDITIONS	4
Permit Enforceability	4
General Provisions	4
Equipment & Design	
Emission Limits	
Testing/Sampling	
Monitoring/Recordkeeping  Certification & Reporting	
Permit Shield	
Revisions	
Reopenings	
Renewals	
Stratospheric Ozone Protection	
Risk Management Plan	
Emission Trading  Permit to Install (PTI)	
B. SOURCE-WIDE CONDITIONS	. 11
C. EMISSION UNIT SPECIAL CONDITIONS	. 12
EMISSION UNIT SUMMARY TABLE	.12
EUCARBON	
EUMIX	
EUWHEEL	
D. FLEXIBLE GROUP SPECIAL CONDITIONS	23
FLEXIBLE GROUP SUMMARY TABLE	23
FGRTO	
FGMMMM	
FGDDDDD	
FGRULE290FGCOLDCLEANERS	
E. NON-APPLICABLE REQUIREMENTS	
E. NON-APPLICABLE REQUIREMENTS	. 51
APPENDICES	. 52
Appendix 1. Acronyms and Abbreviations	
Appendix 2. Schedule of Compliance	
Appendix 3. Monitoring Requirements	
Appendix 5. Testing Procedures	
Appendix 5. Testing Procedures	
Appendix 7. Emission Calculations	
Appendix 8. Reporting	

## **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
  - 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).<sup>2</sup> (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.<sup>1</sup> (R 336.1901(a))
  - b. Unreasonable interference with the comfortable enjoyment of life and property. (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).<sup>2</sup> (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 annual compliance certification (pursuant to Rule 213(4)(c)) shall be submitted to the USEPA through the USEPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through CDX (<a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>), unless it contains confidential business information then use the following address: 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.<sup>2</sup> (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):
  - a. June 21, 1999,
  - b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
  - c. The date on which a regulated substance is first present above a threshold quantity in a process.
- 40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
- 41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

## **Emission Trading**

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

### Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<sup>2</sup> (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.<sup>2</sup> (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.<sup>2</sup> (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.<sup>2</sup> (R 336.1201(4))

#### Footnotes:

<sup>&</sup>lt;sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup>This 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
EUCARBON	Carbon black transport system. Gravity feed of carbon from truck to hopper. Pneumatic transfer of carbon from hopper to four (4) silos, with baghouse filters.	05-01-1988/ 06-30-1988	NA
EUMIX	Four rubber mills and one mixer, all venting to one external baghouse.	03-01-1988/ 05-01-1988/ 12-21-2016	NA
EUWHEEL	Wheelabrator Tumblast, controlled by an externally venting Wheelabrator dust collector.	06-01-1979	NA
EURUBBERMIX2	Rubber mixer controlled by externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.	02-20-2006	FGRULE290
EU001CLEAN	One small wash station for cleaning parts.	01-01-1980/ 01-01-1981	FGCOLDCLEANERS
EU002CLEAN	One small wash station for cleaning parts.	01-01-1980/ 01-01-1981	FGCOLDCLEANERS
EU003CLEAN	One small wash station for cleaning parts.	01-01-1980/ 01-01-1981	FGCOLDCLEANERS
EU004CLEAN	One small wash station for cleaning parts.	01-01-1980/ 01-01-1981	FGCOLDCLEANERS
EU005CLEAN	One small wash station for cleaning parts.	01-01-1980/ 01-01-1981	FGCOLDCLEANERS
EU006CLEAN	One small wash station for cleaning parts.	01-01-1980/ 01-01-1981	FGCOLDCLEANERS
EUSIL01	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1988/ 05-12-2015	FGRTO FGMMMM

Emission Unit ID	Emission Unit Description	Installation	Flexible Group ID
	(Including Process Equipment & Control Device(s))	Date/ Modification Date	
EUSIL02	A turbo spray system used for applying cement	1989/	FGRTO
EUSILUZ	to metal and plastic parts. The system	05-12-2015	FGMMMM
	consists of an electrically heated tunnel, a	03-12-2013	1 Giviiviiviivi
	primer application booth, a topcoat application		
	booth and an electrically heated drying		
	tunnel. VOC emissions from the system are		
	controlled by a common regenerative thermal		
	oxidizer.		
EUSIL03	A spray system used for applying cement to	1989/	FGRTO
	metal and plastic parts. The system consists	05-12-2015	FGMMMM
	of an electrically heated tunnel, a primer		
	application booth, a topcoat application booth		
	and an electrically heated drying tunnel. VOC		
	emissions from the system are controlled by a		
	common regenerative thermal oxidizer.		
EUCOE01	Chain-on-edge number 1 is two (2) automated	08-26-2013/	FGRTO
	spray booths for applying cement to metal and	05-12-2015	FGMMMM
	plastic parts. Prior to entering the booths, the		
	parts first pass through a pre-heat oven. The		
	chain-on-edge rotates the parts through the		
	robot-mounted spray guns. VOC emissions		
	from this line are controlled by a common		
FUODESS	regenerative thermal oxidizer.	40.00.0004	FORTO
EUCOE02	Chain-on-edge number 2 is two (2) automated	10-20-2021	FGRTO
	spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the		FGMMMM
	parts first pass through a pre-heat oven. The		
	chain-on-edge rotates the parts through the		
	robot-mounted spray guns. VOC emissions		
	from this line are controlled by a common		
	regenerative thermal oxidizer. This emission		
	unit is considered a PTE.		
EUPR1	An adhesive coating line used to apply	10-20-2021	FGRTO
	adhesive to both metal and plastic parts.		FGMMMM
	Emissions will be controlled by an RTO.		
EURC1	An adhesive coating line used to apply	10-20-2021	FGRTO
	adhesive to both metal and plastic parts.		FGMMMM
	Emissions will be controlled by an RTO.		
EURC2	An adhesive coating line used to apply	10-20-2021	FGRTO
	adhesive to both metal and plastic parts.		FGMMMM
	Emissions will be controlled by an RTO.		
EURC3	An adhesive coating line used to apply	10-20-2021	FGRTO
	adhesive to both metal and plastic parts.		FGMMMM
EUDOU EES	Emissions will be controlled by an RTO.	04.04.15=5	5000005
EUBOILER2	Natural gas fired boiler for building heat; 26.0	01-01-1956	FGDDDDD
EUPOILED4	MMBTU/hr.	01 22 2019	ECDDDDD
EUBOILER4	Natural gas fired boiler for building heat; 12.55 MMBTU/hr.	01-22-2018	FGDDDDD

# EUCARBON EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Carbon black transport system; gravity feed of carbon from truck to hopper. Pneumatic transfer of carbon from hopper to four (4) silos with baghouse filters.

Flexible Group ID: NA

## POLLUTION CONTROL EQUIPMENT

Baghouse filters

## I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
ĺ	I. Particulate	0.10 lbs. per 1,000 lbs. of exhaust	Hourly	EUCARBON	SC V.1 SC VI.1, VI.2	R 336.1331(1)(a), Table 31, item J
		gases, corrected to 50% excess air <sup>2</sup>				

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUCARBON unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1213(2), R 336.1911)

## 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. Upon request of the AQD District Supervisor, the permittee shall verify PM emission rates from one or more of the EUCARBON baghouses by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and/or Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test<sup>2</sup>. (R 336.2001, R 336.2003, R 336.2004)
- 2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

### 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 conduct and record quarterly maintenance checks of equipment. (R 336.1213(3))
- The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUCARBON is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions. (R 336.1213(3))
- 3. The permittee shall monitor and record the pressure drop across the baghouses at least once per operating day. (R 336.1213(3))

## 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))

See Appendix 8

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

NA

## Footnotes:

- <sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
- <sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

ROP No: MI-ROP-E5094-2024 Expiration Date: August 20, 2029

PTI No: MI-PTI-E5094-2024

## **EUMIX EMISSION UNIT CONDITIONS**

## **DESCRIPTION**

Four rubber mills and one mixer, all venting to one external baghouse.

Flexible Group ID: NA

## POLLUTION CONTROL EQUIPMENT

Fabric filter (baghouse)

## I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Particulate	1.44 lbs. per hour <sup>2</sup>	Monthly average which is calculated using the actual operating hours for that month	EUMIX	SC V.1 SC VI.1	R 336.1331(1)(c)
2. Particulate	6.29 tons per year <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month	EUMIX	SC V.1 SC VI.1	R 336.1331(1)(c)
3. Particulate	0.01 lbs. per 1,000 lbs. of exhaust gases calculated on a dry gas basis <sup>2</sup>	Hourly	EUMIX	SC V.1 SC VI.1	R 336.1331(1)(c)
4. Opacity	5%²	6-minute average	EUMIX	SC VI.2	R 336.1301(c)

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUMIX unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The

permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1213(2), R 336.1911)

## 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. Upon request of the AQD District Supervisor, the permittee shall verify PM emission rates from the EUMIX baghouse by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and/or Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
- 2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

#### 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 conduct and record quarterly maintenance checks of equipment.<sup>2</sup> (R 336.1301, R 336.1331)
- 2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUMIX is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions.<sup>2</sup> (R 336.1301)
- 3. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the baghouse at least once per operating day. (R 336.1213(3))

## 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))

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
1. SV-PULSEJET	43 <sup>2</sup>	33 <sup>2</sup>	40 CFR 52.21 (c) and (d)

## IX. OTHER REQUIREMENT(S)

NA

## Footnotes:

<sup>&</sup>lt;sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# EUWHEEL EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Wheelabrator Tumblast (shot blast machine)

Flexible Group ID: NA

## POLLUTION CONTROL EQUIPMENT

Externally venting Wheelabrator baghouse

## I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lbs. per 1,000 lbs. of exhaust gases calculated on a dry gas basis <sup>2</sup>	Hourly	EUWHEEL	SC V.1 SC VI.1, VI.2	R 336.1331(1)(a), Table 31, item J

## II. MATERIAL LIMIT(S)

NA

### III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate the Tumblast operation unless the baghouse is installed and operating properly.<sup>2</sup>
  (R 336.1910)
- 2. The permittee shall not operate EUWHEEL unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for guick replacement.
  - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1213(2), R 336.1911)

## 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. Upon request of the AQD District Supervisor, the permittee shall verify PM emission rates from the EUWHEEL baghouse by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and/or Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
- 2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

#### 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 conduct and record quarterly maintenance checks of equipment. (R 336.1213(3))
- 2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUWHEEL is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions. (R 336.1213(3))
- 3. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the baghouse at least once per operating day. (R 336.1213(3))

## 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))

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
1. SV-WHEEL	15 <sup>2</sup>	26 <sup>2</sup>	R 336.1901

## IX. OTHER REQUIREMENT(S)

NA

#### Footnotes:

<sup>&</sup>lt;sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup> This 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.

Florible One on ID Florible One on Description Associated				
Flexible Group ID	Flexible Group Description	Associated		
EGDEG	T (0) 1 1 1 1 (0)	Emission Unit IDs		
FGRTO	Two (2) automated chain-on-edge spray lines, three (3) Silver spray lines, and four (4) adhesive coating lines all used to coat metal and plastic parts. The VOC emissions from these nine (9) lines are controlled by a common regenerative thermal oxidizer.	EUSIL01 EUSIL02 EUSIL03 EUCOE01 EUCOE02 EUPR1 EURC1 EURC2 EURC3		
FGMMMM	Each existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR Part 63, Subpart MMMM, 40 CFR 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.	EUSIL01 EUSIL02 EUSIL03 EUCOE01 EUCOE02 EUPR1 EURC1 EURC2 EURC3		
FGDDDDD	Requirements for new and existing boiler(s) and process heater(s) that are designed to burn gas 1 subcategory fuel with a heat input capacity of 10 MMBTU/hr or greater at major sources of HAP emissions per 40 CFR 63, Subpart DDDDD (Boiler MACT). Units designed to burn gas 1 subcategory fuels include boilers or process heaters that burn only natural gas, refinery gas, and/or Other Gas 1 fuels. Units that burn liquid fuel for testing or maintenance purposes for less than a total of 48 hours per year, or that burn liquid fuel during periods of curtailment or supply interruptions are included in this definition.	EUBOILER2 EUBOILER4		

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification. This source includes a rubber mixer controlled by an externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.	EURUBBERMIX2
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. This source includes six (6) small wash stations for cleaning parts.	EU001CLEAN EU002CLEAN EU003CLEAN EU004CLEAN EU005CLEAN EU006CLEAN

# FGRTO FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

Two (2) automated chain-on-edge spray lines, three (3) Silver spray lines, and four (4) adhesive coating lines all used to coat metal and plastic parts. The VOC emissions from these nine (9) lines are controlled by a common regenerative thermal oxidizer subject to Compliance Assurance Monitoring (CAM).

Emission Units: EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, EURC3

## POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO), fabric filters

## I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	50.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGRTO	SC VI.2, VI.3	R 336.1205, R 336.1702(a)
2. VOCs	23.6 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUPR1, EURC1, EURC2, and EURC3 combined	SC VI.2, VI.4	R 336.1205, R 336.1702(a)
3. Ethylbenzene	2.3 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	EUPR1, EURC1, EURC2, and EURC3 combined	SC VI.5	R 336.1225
4. Methyl isobutyl ketone	11.0 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	EUPR1, EURC1, EURC2, and EURC3 combined	SC VI.5	R 336.1225

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.<sup>2</sup> (R 336.1224, R 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.<sup>2</sup> (R 336.1224, R 336.1702(a))

4. The permittee shall not operate FGRTO unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:

- a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
- b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))

- 5. The permittee shall maintain a facial velocity of 200 feet per minute though each natural draft opening of each PTE on a 3-hour block average basis.<sup>2</sup> (R 336.1702(a), R 336.1910)
- 6. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f) for non-PTE enclosures.<sup>2</sup> (R 336.1702(a), R 336.1910)

## IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate the spray booths in FGRTO unless all respective exhaust filters are installed and operating in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910)
- 2. The permittee shall equip and maintain each spray booth in FGRTO with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.<sup>2</sup> (R 336.1702(a))
- 3. The permittee shall not operate FGRTO unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC control efficiency (combined capture and destruction efficiencies) of 85 percent (by weight), maintaining a minimum temperature of 1,450°F, and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1,450°F based upon a 3-hour block average.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702, R 336.1910, 40 CFR 64.6(c)(1)(i))
- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis during operation of any portion of FGRTO.<sup>2</sup> (R 336.1205, R 336.1225, , R 336.1702(a), R 336.1910)
- 5. If the enclosure is a PTE, the permittee shall not operate EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE2, EUPR1, EURC1, EURC2, or EURC3 unless the respective PTE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following: (R 336.1702(a), R 336.1910)
  - a. The direction of the air must be into the enclosure at all times.
  - b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.

6. If the enclosure is not a PTE, the permittee shall not operate EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, or EURC3 unless the respective enclosure is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following:<sup>2</sup> (R 336.1702(a), R 336.1910)

a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and addon control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

## V. TESTING/SAMPLING

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

- 1. The permittee shall determine the VOC content, water content, and density of any adhesives and coatings, as applied and as received, randomly on a yearly basis with all coatings and adhesives tested within a five-year period using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from the manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1702)
- 2. Within 180 days of startup of EUCOE2 and afterwards upon request of the AQD District Supervisor, the permittee shall determine the overall VOC control efficiency of FGRTO, the capture efficiency of the emission units in FGRTO (including EUPR1, EURC1, EURC2, EURC3), and the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. Thereafter, the permittee must complete the testing once every five years from the most recent test. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a), R 336.1902, R 336.1910)
- 3. At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down spray booth operations when the temperature of the regenerative thermal oxidizer drops below the minimum temperature requirement. Verification of the interlock system's operational integrity shall be conducted using methods, plans, and procedures approved by the AQD prior to testing. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. (R 336.1213(3))

## VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each adhesive, coating, thinner, solvent, additive, and catalyst, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a monthly basis for FGRTO:
  - a. Gallons (with water) of each adhesive, coating, thinner, solvent, additive, and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive and catalyst used to coat plastic parts.
  - b. Where applicable, gallons (with water) of each material reclaimed.

- c. VOC content (with water) of each material as applied.
- d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD District Supervisor.<sup>2</sup> (R 336.1205, R 336.1702(a))

- 4. The permittee shall keep the following information on a monthly basis for EUPR1, EURC1, EURC2, and EURC3:
  - a. Gallons (with water) of each adhesive, coating, thinner, solvent, additive, and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive, and catalyst used to coat plastic parts.
  - b. Where applicable, gallons (with water) of each material reclaimed.
  - c. VOC content (with water) of each material as applied.
  - d. VOC mass emission calculations for EUPR1, EURC1, EURC2, and EURC3 combined determining the monthly emission rate in tons per calendar month.
  - e. VOC mass emission calculations for EUPR1, EURC1, EURC2, and EURC3 combined determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept using mass balance or an alternative method and format acceptable to the AQD District Supervisor.<sup>2</sup> (R 336.1205, R 336.1702(a))

- 5. The permittee shall keep the following information on a monthly basis for all adhesive coating lines:
  - a. Gallons (with water) of each ethylbenzene and methyl isobutyl ketone-containing material used.
  - b. Where applicable, gallons (with water) of each ethylbenzene and methyl isobutyl ketone-containing material reclaimed.
  - c. The ethylbenzene and methyl isobutyl ketone content (with water), each separately, in pounds per gallon of each material used.
  - d. Ethylbenzene and methyl isobutyl ketone mass emission calculations, each separately, determining the monthly emission rate in tons per calendar month.
  - e. Ethylbenzene and methyl isobutyl ketone mass emission calculations, each separately, determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225)

- 6. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the RTO, on a continuous basis, during operation of FGRTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request.<sup>2</sup> (R 336.1205, R 336.1702)
- 7. The permittee shall keep, in a satisfactory manner, operating temperature records for the RTO as required by SC IV.3. If the measured operating temperature of the RTO falls below 1,450°F during operation of FGRTO, the permittee may demonstrate compliance based upon a three-hour block average temperature by calculating the average operating temperature for each three-hour period which includes one or more temperature readings below 1,450°F. The permittee shall keep all records and calculations on file at the facility and make them available to the Department upon request.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702, R 336.1910)
- 8. The permittee shall continuously monitor combustion chamber temperature and record every 15 minutes for an hourly average as an indicator of proper operation of the RTO. The indicator range is a higher of the minimum temperature of 1,450°F or the average combustion temperature in any 3-hour period at or above the combustion

temperature limit established according to 40 CFR 63.3967(a). (40 CFR 64.6(c)(1)(i) and (ii)); (40 CFR 63.3963(c))

9. The permittee shall evaluate the capture efficiency of the capture system that is a Permanent Total Enclosure (PTE) by verifying that the direction of the air flow is into the enclosure at all times and the average facial velocity of air through all-natural draft openings in the enclosure is at least 200 feet per minute. (40 CFR 64.3(a)(2)); 40 CFR 63.3963(c))

- 10. The permittee shall evaluate the capture efficiency of the capture system that is not a Permanent Total Enclosure (Not a PTE) by verifying that the average gas volumetric flow rate or duct static pressure in each duct between the capture device and the add-on control device inlet in any 3-hour period is at or above the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f). (40 CFR 64.3(a)(2)): (40 CFR 63.3963(c))
- 11. The thermocouples, anemometers, and the flow meters shall continuously monitor the RTO combustion chamber temperature, facial velocity through natural draft openings in the enclosure, and gas volumetric flowrate in each duct, respectively. The averaging period is 3-hours. The monitors shall be calibrated annually or according to manufacturer recommendations, whichever is more frequent. (40 CFR 64.6(c)(1)(iii))
- 12. An excursion is defined as follows:
  - a. RTO Combustion Temperature: Any 3-hour block average combustion chamber temperature less than 1450°F or the average combustion temperature in any 3-hour period below the combustion temperature limit established according to 40 CFR 63.3967(a), whichever is higher.
  - b. Not a PTE: Three-hour block average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).
  - c. PTE: An indication that the direction of air flow is not into the enclosure or a facial velocity less than 200 feet per minute. (40 CFR 64.6(c)(2))
- 13. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). In response to excursions, the permittee shall follow corrective actions specified in facility's Malfunction Abatement Plan. (40 CFR 64.7(d))
- 14. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 15. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))
- 16. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan, and any activities undertaken to implement a quality improvement plan, and

other information such as data used to document the adequacy of monitoring or records of monitoring

### See Appendix 3

## VII. REPORTING

maintenance or corrective actions. (40 CFR 64.9(b)(1))

- 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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204 shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of the new EUCOE2<sup>2</sup> (R 336.1201(7)(a))
- 5. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))
- 6. Each semiannual report of monitoring and deviations shall include summary information on the number, duration, and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. (40 CFR 64.9(a)(2)(i))
- 7. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. (40 CFR 64.9(a)(2)(ii))

### See Appendix 8

## VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTO	242	<b>38</b> <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (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, Subparts A and MMMM as they apply to FGRTO.<sup>2</sup> (40 CFR Part 63, Subparts A and MMMM)
- 2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP as they apply to FGRTO.<sup>2</sup> (40 CFR Part 63, Subparts A and PPPP)

- 3. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)
- 4. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))

#### Footnotes:

<sup>&</sup>lt;sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>&</sup>lt;sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# FGMMMM FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

Each existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR Part 63, Subpart MMMM, 40 CFR 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage, if they are directly related to the application of the coating.

Compliance with the requirements of 40 CFR, Subpart MMMM, constitutes compliance with 40 CFR, Subpart PPPP.

Emission Units: EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, EURC3

### POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO), fabric filters

## I. <u>EMISSION LIMIT(S)</u>

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	37.7 lbs per gal	12-month rolling time	Existing –	SC V.1, SC V.2,	40 CFR
	of coating	period, as determined at	Rubber-to-Metal	VI.1 through	63.3890(b)(4)
	solids <sup>2</sup>	the end of each calendar	Coating	VI.10	
		month			

- 2. 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.<sup>2</sup> **(40 CFR 63.3891)** 

- 3. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the applicable emission limits at all times except during periods of startup, shutdown, and malfunction.<sup>2</sup> (40 CFR 63.3900(a)(2)(i))
- 4. Any coating operation(s) 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 times. (40 CFR 63.3900(a)(1))
- 5. 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))
- 6. The permittee may comply with a facility-specific emission limit calculated from the relative amount of coating activity that is subject to each emission limit. If the permittee elects to comply using the facility-specific

emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this and other applicable surface coating NESHAP. The procedures for calculating the facility-specific emission limit are specified in 40 CFR 63.3890. In calculating a facility-specific emission limit, include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at the facility. (40 CFR 63.3881(e)(3))

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by, the controlled coating operation(s). The work practice plan shall specify practices and procedures to ensure at a minimum the following elements are implemented:
  - a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.<sup>2</sup> (40 CFR 63.3893(b)(1))
  - b. Spills of organic HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.<sup>2</sup> (40 CFR 63.3893(b)(2))
  - c. Organic HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.<sup>2</sup> (40 CFR 63.3893(b)(3))
  - d. Mixing vessels which contain organic HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.<sup>2</sup> (40 CFR 63.3893(b)(4))
  - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.<sup>2</sup> (40 CFR 63.3893(b)(5))
  - f. The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g).<sup>2</sup> (40 CFR 63.3893(c))

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g).<sup>2</sup> (40 CFR 63.3893(c))

- 2. If the affected source uses an emission capture system and add-on control device, the permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.<sup>2</sup> (40 CFR 63.3900(c))
- 3. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction.<sup>2</sup> (40 CFR 63.3900(a)(2)(ii))
- 4. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the work practice standards in 40 CFR 63.3893 at all times.<sup>2</sup> (40 CFR 63.3900(a)(2)(iii))

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall not operate FGMMMM unless the RTO is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (40 CFR 63.3892(b))

2. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart MMMM as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3967. The permittee must meet the operating limits at all times after established. (40 CFR 63.3892(b), 40 CFR Part 63, Subpart MMMM, Table 1)

Add-on Control Device	Operating Limit
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).
Emission capture system that is a PTE according to 40 CFR 63.3965(a)	<ul><li>a. The direction of the air flow must be into the enclosure at all times; and either</li><li>b. The average facial velocity of air through all-natural draft openings in the enclosure must be at least 200 feet per minute; or</li></ul>
,	c. The pressure drop across the enclosure must be at least 0.007 inches $H_2O$ , as established in Method 204 of Appendix M of 40 CFR Part 51.
Emission capture system that is not a PTE according to 40 CFR 63.3965(a)	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

## V. TESTING/SAMPLING

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

- 1. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.3941, 40 CFR 63.3951, and/or 40 CFR 63.3961. (40 CFR 63.3941, 40 CFR 63.3951, 40 CFR 63.3961)
- 2. For any coating operation(s) using the emission rate with add-on controls option, the permittee must conduct each performance test required by 40 CFR 63.3960 according to the requirements in 40 CFR 63.3964(a)(1) and (2). The permittee must conduct each performance test of an emission capture system according to the requirements in 40 CFR 63.3965. The permittee must conduct each performance test of an add-on control device according to the requirements in 40 CFR 63.3966. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2002, R 336.2003, 40 CFR 63.3964(a) and (b))
- 3. The permittee shall conduct each performance test of an emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.3965 and 40 CFR 63.3966.<sup>2</sup> (40 CFR 63.3964(b))
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

## 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 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 12<sup>th</sup> month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months.<sup>2</sup> (40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960)

2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931.<sup>2</sup> (40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j))

- 3. 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 MMMM, 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. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.3930(c)(4)(i) through (v). (40 CFR 63.3930(c)(4))
  - g. 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))
  - h. 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))
  - i. The volume fraction of coating solids for each coating used during each compliance period. (40 CFR 63.3930(f))
  - j. For either the emission rate without add-on controls or with add-on controls option, the density of each coating, thinner and/or other additive, and cleaning material used during each compliance period. (40 CFR 63.3930(g))
  - k. 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))
  - I. The date, time, and duration of each deviation. (40 CFR 63.3930(j))
  - m. For the emission rate with add-on controls option, records specified in 40 CFR 63.3930(k)(1) through 40 CFR 63.3930(k)(8). **(40 CFR 63.3930(k))**
- 4. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 of 40 CFR Part 63, Subpart MMMM using the applicable method(s) described below: (40 CFR 63.3963(c))

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method		
Thermal oxidizer	The average combustion temperature in any 3-hour period must not fall below	i. Collect the combustion temperature data according to 40 CFR 63.3968(c);		
	the combustion temperature limit established according to 40 CFR 63.3967(a).	ii. Reduce the data to 3-hour block averages; and		
		iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.		
system that is a PTE according to 40 CFR 63.3965(a)	The direction of the air flow must be into the enclosure at all times; and	Collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to		
	<ul> <li>The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or</li> </ul>	ii. Maintain the facial velocity of air flow through all natural draft openings at or above the facial velocity limit and		
	c. The pressure drop across the enclosure must be at least 0.007-inch H <sub>2</sub> O, as established in Method 204 of Appendix M of 40 CFR Part 51.	maintain the direction of air flow into the enclosure at all times.		
Emission capture system that is not a PTE according to 40 CFR 63.3965(a)	The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device	i. Collect the gas volumetric flow rate for each capture device according to 40 CFR 63.3968(g);		
		ii. Reduce the data to 3-hour block averages; and		
	according to 40 CFR 63.3967(f).	iii. Maintain the 3-hour average gas volumetric flow rate for each capture device at or above the gas volumetric flow rate.		

- 5. For any coating operation(s) using the emission rate with 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 the procedures in 40 CFR 63.3961.<sup>2</sup> (40 CFR 63.3963)
- 6. During the performance test required by 40 CFR 63.3960, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.3967 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.3892.<sup>2</sup> (40 CFR 63.3967)
- 7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.3968(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.3968(b).<sup>2</sup> (40 CFR 63.3968)
- 8. The permittee must apply to the USEPA for approval of alternative monitoring under 40 CFR 63.8(f), if using an add-on control device other than those listed in Table 1 of 40 CFR Part 63, Subpart MMMM, or to monitor an alternative parameter and comply with a different operating limit.<sup>2</sup> (40 CFR 63.3892(c))

## See Appendix 3

#### 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. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7):
  - a. The organic HAP emission rate for any 12-month compliance period exceeding the applicable emission limit specified in 40 CFR 63.3890.<sup>2</sup> (40 CFR 63.3963(b))
  - b. An operating parameter that is out of the allowed range.<sup>2</sup> (40 CFR 63.3963(c)(1))
  - c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened.<sup>2</sup> (40 CFR 63.3963(d))
  - d. Deviations from work practice standards.<sup>2</sup> (40 CFR 63.3963(e))
- 5. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910.<sup>2</sup> (40 CFR 63.3910, 40 CFR Part 63, Subparts A and MMMM)
- 6. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance.<sup>2</sup> (40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f))
- 7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for emission capture systems and add-on control devices.<sup>2</sup> (40 CFR 63.3920(b))
- 8. If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit an SSM report as specified in 40 CFR 63.3920(c).<sup>2</sup> (40 CFR 63.3920(c), 40 CFR 63.10(d))
- 9. The permittee must report the results of performance tests for emission capture systems and add-on control devices within 60 days after the completion of the performance tests. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD.<sup>2</sup> (R 336.2001(5), 40 CFR 63.3920(b))
- 10. The permittee must submit the following:
  - a. Within 60 days after the date of completing each performance test for emission capture systems and add-on control devices, the results of the performance tests required by 40 CFR Part 63, Subpart MMMM must be submitted to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's Central Data Exchange (CDX) (<a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>). Performance test data must be submitted in the file format generated through use of the USEPA's Electronic Reporting Tool (ERT) (see <a href="http://www.epa.gov/ttn/chief/ert/index.html">http://www.epa.gov/ttn/chief/ert/index.html</a>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website. For data collected using test methods not listed on the ERT Website, the permittee must submit the results of the

performance test to the Administrator at the appropriate address listed in 40 CFR 63.13.2 (40 CFR 63.3920(b) and (d))

- b. Initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in 40 CFR 63.9(h) and 40 CFR 63.3910(c) are to be submitted to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>). The permittee must upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF). The applicable notification must be submitted by the deadline specified in this subpart, regardless of the method in which the reports are submitted.<sup>2</sup> (40 CFR 63.3920(e))
- c. On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for 1-year, whichever date is later, the semiannual compliance report required in 40 CFR 63.3920(a) must be submitted to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<a href="https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri">https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri</a>). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year, begin submitting all subsequent reports via CEDRI.<sup>2</sup> (40 CFR 63.3920(f))

#### See Appendix 8

## VIII. STACK/VENT RESTRICTION(S)

NA

## 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 MMMM for Surface Coating of Miscellaneous Metal Parts and Products.<sup>2</sup> (40 CFR Part 63, Subparts A and MMMM)

#### Footnotes:

- This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
- <sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

# FGDDDD FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Requirements for new and existing boiler(s) and process heater(s) that are designed to burn gas 1 subcategory fuel with a heat input capacity of 10 MMBTU/hr or greater at major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). Units designed to burn gas 1 subcategory fuels include boilers or process heaters that burn only natural gas, refinery gas, and/or Other Gas 1 fuels. Units that burn liquid fuel for testing or maintenance purposes for less than a total of 48 hours per year, or that burn liquid fuel during periods of curtailment or supply interruptions are included in this definition.

Emission Units: EUBOILER2, EUBOILER4

#### **POLLUTION CONTROL EQUIPMENT**

NA

I. <u>EMISSION LIMIT(S)</u>

NA

II. MATERIAL LIMIT(S)

NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall conduct an annual tune-up of each boiler or process heater as specified below. The annual tune-up shall be no more than 13 months after the previous tune-up. (40 CFR 63.7500(a)(1), 40 CFR 63.7515(d), Table 3 of 40 CFR Part 63, Subpart DDDDD)
  - a. As applicable, 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 the tune-up or delay the burner inspection until the next scheduled unit shutdown. Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. 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 NOx 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))

2. If the unit is not operated on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. (40 CFR 63.7540(a)(13))

3. At all times, the permittee must operate and maintain each existing gas 1 boiler or process heater, including associated air pollution control equipment and monitoring equipment, 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))

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

NA

#### V. TESTING/SAMPLING

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

- 1. The permittee must conduct an initial fuel specification analysis according to the procedures stated in SC V.2 through SC V.5, and according to the frequency listed as stated in SC V.6, and maintain records of the results of the testing as outlined in in SC VI.2. For samples where the initial mercury specification has not been exceeded, the permittee will include a signed certification with the Notification of Compliance Status that the initial fuel specification test meets the gas specification outlined in the definition of Other Gas 1 fuels. (40 CFR 63.7530(g)
- 2. To demonstrate that a gaseous fuel other than natural gas or refinery gas qualifies as an Other Gas 1 fuel, as defined in 40 CFR 63.7575, the permittee must conduct a fuel specification analysis for mercury according to the procedures stated in SC V.3 through SC V.5 and Table 6 in 40 CFR Part 63, Subpart DDDDD, as applicable, except as listed below. Or, as an alternative where fuel specification analysis is not practical, the permittee must measure mercury concentration in the exhaust gas when firing only the gaseous fuel to be demonstrated as an Other Gas 1 fuel in the boiler or process heater according to the procedures in Table 6 to 40 CFR Part 63, Subpart DDDDD. (40 CFR 63.7521(f))
  - a. The permittee is not required to conduct the fuel specification analysis in SC V.3 through SC V.5 for any of the fuels listed below:
    - i. For natural gas or refinery gas. (40 CFR 63.7521(f)(1))
    - ii. For gaseous fuels that are subject to another subpart of 40 CFR Part 63, Part 60, Part 61, or Part 65. (40 CFR 63.7521(f)(2))
    - iii. On gaseous fuels for units that are complying with the limits for units designed to burn gas 2 (other) fuels. (40 CFR 63.7521(f)(3))
    - iv. For gas streams directly derived from natural gas at natural gas production sites or natural gas plants. (40 CFR 63.7521(f)(4))
- 3. The permittee must develop a site-specific fuel analysis plan for Other Gas 1 fuels according to the following procedures and requirements as listed below: (40 CFR 63.7521(g))
  - a. If the permittee intends to use an alternative analytical method other than those required by Table 6 of 40 CFR Part 63, Subpart DDDDD, the permittee must submit the fuel analysis plan to the Administrator for review and approval no later than 60 days before the date that the permittee intends to conduct the initial compliance demonstration described in 40 CFR 63.7510. (40 CFR 63.7521(g)(1))
  - b. The permittee must include the following information in the fuel analysis plan: (40 CFR 63.7521(g)(2))
    - i. The identification of all gaseous fuel types other than those stated in SC V.2 anticipated to be burned in each boiler or process heater. (40 CFR 63.7521(g)(2)(i))
    - ii. For each anticipated fuel type, the identification of whether the permittee or a fuel supplier will be conducting the fuel specification analysis. (40 CFR 63.7521(g)(2)(ii))

iii. For each anticipated fuel type, a detailed description of the sample location and specific procedures to be used for collecting and preparing the samples if the procedures are different from the sampling methods contained in Table 6 of 40 CFR Part 63, Subpart DDDDD. Samples should be collected at a location that most accurately represents the fuel type, where possible, at a point prior to mixing with other dissimilar fuel types. If multiple boilers or process heaters are fueled by a common fuel stream, it is permissible to conduct a single gas specification at the common point of gas distribution. (40 CFR 63.7521(g)(2)(iii))

- iv. For each anticipated fuel type, the analytical methods from Table 6 of 40 CFR Part 63, Subpart DDDDD, with the expected minimum detection levels, to be used for the measurement of mercury. (40 CFR 63.7521(g)(2)(iv))
- v. If the permittee requests to use an alternative analytical method other than those required by Table 6 of 40 CFR Part 63, Subpart DDDDD, the permittee must also include a detailed description of the methods and procedures that the permittee is proposing to use. Methods in Table 6 of 40 CFR Part 63, Subpart DDDDD shall be used until the requested alternative is approved. (40 CFR 63.7521(g)(2)(v))
- vi. If the permittee will be using fuel analysis from a fuel supplier in lieu of site-specific sampling and analysis, the fuel supplier must use the analytical methods required by Table 6 of 40 CFR Part 63, Subpart DDDDD. When using a fuel supplier's fuel analysis, the permittee is not required to submit the information in SC V.3.b.iii. (40 CFR 63.7521(g)(2)(vi))
- 4. The permittee must obtain a single fuel sample for each fuel type for fuel specification of gaseous fuels. (40 CFR 63.7521(h))
- 5. The permittee must determine the concentration in the fuel of mercury, in units of microgram per cubic meter, dry basis, of each sample for each Other Gas 1 fuel type according to the procedures in Table 6 of 40 CFR Part 63, Subpart DDDDD. (40 CFR 63.7521(i))
- 6. If the permittee elected to demonstrate that the unit meets the specification for mercury for the unit designed to burn Other Gas 1 fuel, the permittee must follow the sampling frequency as listed below and conduct this sampling according to the procedures in SC V.2 through SC V.5. (40 CFR 63.7540(c))
  - a. If the initial mercury constituents in the gaseous fuels are measured to be equal to or less than half of the mercury specification as defined in 40 CFR 63.7575, the permittee does not need to conduct further sampling. (40 CFR 63.7540(c)(1))
  - b. If the initial mercury constituents are greater than half but equal to or less than 75% of the mercury specification as defined in 40 CFR 63.7575, the permittee will conduct semiannual sampling. If 6 consecutive semiannual fuel analyses demonstrate 50% or less of the mercury specification, the permittee does not need to conduct further sampling. If any semiannual sample exceeds 75% of the mercury specification, the permittee must return to monthly sampling for that fuel, until 12 months of fuel analyses again are less than 75% of the compliance level. (40 CFR 63.7540(c)(2))
  - c. If the initial mercury constituents are greater than 75% of the mercury specification as defined in 40 CFR 63.7575, the permittee will conduct monthly sampling. If 12 consecutive monthly fuel analyses demonstrate 75% or less of the mercury specification, the permittee may decrease the fuel analysis frequency to semiannual for that fuel. (40 CFR 63.7540(c)(3))

#### 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 that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or annual compliance report that the permittee submitted. (40 CFR 63.7555(a)(1))
- 2. The permittee must keep a copy of the records of fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii). (40 CFR 63.7555(a)(2))

3. If the permittee elected to demonstrate that the unit meets the specification for mercury for the unit designed to burn gas 1 subcategory, the permittee must maintain monthly, or at the frequency specified in SC V.6, records of the calculations and results of the fuel specification for mercury in Table 6 of 40 CFR Part 63, Subpart DDDDD to demonstrate that the unit meets the specification for mercury for Other Gas 1 fuels. (40 CFR 63.7555(g))

- 4. If the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under 40 CFR Part 63, Other Gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR Part 60 or Part 61, or Part 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. (40 CFR 63.7555(h))
- 5. The permittee shall maintain on-site and submit, if requested by the AQD, an annual tune-up report containing the information listed below:
  - a. 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))
  - b. A description of any corrective actions taken as a part of the tune-up. (40 CFR 63.7540(a)(10)(vi)(B))
  - c. 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))
- 6. The permittee's records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). **(40 CFR 63.7560(a))**
- 7. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63.7560(b))
- 8. 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 2-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 3-years. (40 CFR 63.7560(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. For the initial compliance demonstration for each boiler or process heater, the permittee must submit the Notification of Compliance Status before the close of business on the 60<sup>th</sup> day following the completion of all compliance demonstrations. The Notification of Compliance Status report must contain all of the information specified below:
  - 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, and a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD. (40 CFR 63.7545(e)(1))
  - b. In addition to the information required in 40 CFR 63.9(h)(2), the notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

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. "The facility has had an energy assessment performed according to 40 CFR 63.7530(e)." (40 CFR 63.7545(e)(8)(ii))
- 5. The permittee must submit an Initial Notification not later than 15-days after the actual date of startup of the affected source. (40 CFR 63.7545(c))
- 6. If the permittee intends to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of 40 CFR Part 63, Part 60, Part 61, or Part 65, or Other Gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575. The notification must include the information as listed below:
  - a. Company name and address. (40 CFR 63.7545(f)(1))
  - b. Identification of the affected unit. (40 CFR 63.7545(f)(2))
  - c. Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared, or the natural gas supply interruption began. (40 CFR 63.7545(f)(3))
  - d. Type of alternative fuel that the permittee intends to use. (40 CFR 63.7545(f)(4))
  - e. Dates when the alternative fuel use is expected to begin and end. (40 CFR 63.7545(f)(5))
- 7. The permittee must submit boiler and process heater tune-up compliance reports to the appropriate AQD District Office. The reports must be postmarked or submitted by March 15<sup>th</sup> and must cover the period of January 1 through December 31 of the reporting year. For new units, the first report should cover the period of startup to December 31 of the reporting year. Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). (40 CFR 63.7550(b))
- 8. The permittee must submit a compliance report containing the following information:
  - 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. The total fuel use by each individual boiler or process heater subject to an emission limit within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by the EPA or the basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure. (40 CFR 63.7550(c)(5)(vi))
  - e. A summary of any fuel specification analyses conducted according to 40 CFR 63.7521(f), stated in SC V.2, and 40 CFR 63.7530(g), stated SC V.3. (40 CFR 63.7550(c)(5)(x))
  - f. If there are no deviations from any emission limits or operating limits in 40 CFR Part 63, Subpart DDDDD that apply to the permittee, a statement that there were no deviations from the emission limits or operating limits during the reporting period. (40 CFR 63.7550(c)(5)(xi))
  - g. If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of a boiler, process heater, or associated air pollution control device or CMS to minimize emissions in accordance with 40 CFR 63.7500(a)(3), stated in SC III.6, including actions taken to correct the malfunction. (40 CFR 63.7550(c)(5)(xiii))

h. 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 and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))

- i. 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))
- 9. The permittee must submit all reports required by Table 9 of this subpart electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (<a href="www.epa.gov/cdx">www.epa.gov/cdx</a>). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, submit the report to the EPA Region V at the appropriate address listed in 40 CFR 63.13 and to the appropriate AQD District Office. (40 CFR 63.7550(h)(3))

See Appendix 8

#### VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

 The permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters as specified in 40 CFR Part 63, Subparts A and DDDDD. (40 CFR Part 63, Subparts A and DDDDD)

#### Footnotes:

- <sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
- <sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

ROP No: MI-ROP-E5094-2024 Expiration Date: August 20, 2029

PTI No: MI-PTI-E5094-2024

# FGRULE290 **FLEXIBLE GROUP CONDITIONS**

## **DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification. This source includes a Rubber mixer controlled by externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016: EURUBBERMIX2

#### POLLUTION CONTROL EQUIPMENT

NA

## I. EMISSION LIMIT(S)

- 1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. (R 336.1290(2)(a)(i))
- 2. Any emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(2)(a)(ii))
  - a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(2)(a)(ii)(A))
  - For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(2)(a)(ii)(B))
  - The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (R 336.1290(2)(a)(ii)(C))
  - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. (R 336.1290(2)(a)(ii)(D))
  - For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. (R 336.1290(2)(a)(ii)(E))
- 3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: (R 336.1290(2)(a)(iii))
  - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(2)(a)(iii)(A))

b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. (R 336.1290(2)(a)(iii)(B))

c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(2)(a)(iii)(C))

## II. MATERIAL LIMIT(S)

NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)
- 2. The following requirements apply to emission units installed <u>on or after</u> December 20, 2016, utilizing control equipment:
  - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: (R 336.1290(2)(b)(i), R 336.1910)
    - Oxidizers and condensers equipped with a continuously displayed temperature indication device.
    - ii. Wet scrubbers equipped with a liquid flow rate monitor.
    - iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
  - b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. (R 336.1290(2)(b)(ii), R 336.1910)

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

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

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. (R 336.1213(3))
  - a. Records identifying each air contaminant that is emitted. (R 336.1213(3))
  - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))
  - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. (R 336.1213(3))
  - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). (R 336.1213(3))

e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in enough detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor.

(R 336.1213(3), R 336.1290(2)(d))

- f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. (R 336.1213(3), R 336.1290(2)(e))
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information: (R 336.1213(3))
  - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(2)(c), R 336.1213(3))
  - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (R 336.1213(3))
- 3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. (R 336.1213(3))

#### VII. 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))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

# FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. This source includes six small wash stations for cleaning parts labeled as EU001CLEAN, EU0002CLEAN, EU003CLEAN, EU004CLEAN, EU005CLEAN, and EU006CLEAN.

Emission Unit: EU001CLEAN, EU002CLEAN, EU003CLEAN, EU004CLEAN, EU005CLEAN, EU006CLEAN

#### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

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

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

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

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

- 1. The cold cleaner must meet one of the following design requirements:
  - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(2)(h))
  - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(2)(r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
- 3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))
- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))

- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

#### V. TESTING/SAMPLING

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

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
  - a. A serial number, model number, or other unique identifier for each cold cleaner.
  - b. The date the unit was installed, manufactured or that it commenced operation.
  - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
  - d. The applicable Rule 201 exemption.
  - e. The Reid vapor pressure of each solvent used.
  - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component, used in each cold cleaner. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1213(3))
- 4. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 5. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

#### VII. 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))

# See Appendix 8

# VIII. STACK/VENT RESTRICTION(S)

NA

# IX. OTHER REQUIREMENT(S)

NA

# **E. NON-APPLICABLE REQUIREMENTS**

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

# **APPENDICES**

**Appendix 1. 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	СО	Carbon Monoxide	
CEM	Continuous Emission Monitoring	CO <sub>2</sub> e	Carbon Dioxide Equivalent	
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot	
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter	
СОМ	Continuous Opacity Monitoring	°F	Degrees Fahrenheit	
Department/	Michigan Department of Environment,	gr	Grains	
department	Great Lakes, and Energy	HAP	Hazardous Air Pollutant	
EGLE	Michigan Department of Environment,	Hg	Mercury	
	Great Lakes, and Energy	hr	Hour	
EU	Emission Unit	HP	Horsepower	
FG	Flexible Group	H <sub>2</sub> S	Hydrogen Sulfide	
GACS	Gallons of Applied Coating Solids	kW	Kilowatt	
GC	General Condition	lb	Pound	
GHGs	Greenhouse Gases	m	Meter	
HVLP	High Volume Low Pressure*	mg	Milligram	
ID	Identification	mm	Millimeter	
IRSL	Initial Risk Screening Level	MM	Million	
ITSL	Initial Threshold Screening Level	MW	Megawatts	
LAER	Lowest Achievable Emission Rate	NMOC	Non-methane Organic Compounds	
MACT	Maximum Achievable Control Technology	NOx	Oxides of Nitrogen	
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram	
MAP	Malfunction Abatement Plan	PM	Particulate Matter	
MSDS	Material Safety Data Sheet	PM10	Particulate Matter equal to or less than 10	
NA	Not Applicable		microns in diameter	
NAAQS	National Ambient Air Quality Standards	PM2.5	Particulate Matter equal to or less than 2.5	
			microns in diameter	
NESHAP	National Emission Standard for Hazardous	pph	Pounds per hour	
NSPS	Air Pollutants New Source Performance Standards	ppm	Parts per million	
		ppmv	Parts per million by volume	
NSR PS	New Source Review	ppmw %	Parts per million by weight Percent	
PSD	Performance Specification			
PTE	Prevention of Significant Deterioration Permanent Total Enclosure	psia	Pounds per square inch absolute	
PTI		psig	Pounds per square inch gauge	
	Permit to Install	scf	Standard cubic feet Seconds	
RACT	Reasonable Available Control Technology	sec		
ROP SC	Renewable Operating Permit	SO <sub>2</sub> TAC	Sulfur Dioxide Toxic Air Contaminant	
	Special Condition			
SCR SDS	Selective Catalytic Reduction	Temp	Temperature	
	Safety Data Sheet	THC	Total Hydrocarbons	
SNCR	Selective Non-Catalytic Reduction	tpy	Tons per year	
SRN	State Registration Number	μg	Microgram	
TEQ	Toxicity Equivalence Quotient	μm	Micrometer or Micron	
USEPA/EPA	United States Environmental Protection	VOC	Volatile Organic Compounds	
\	Agency	yr	Year	
VE	Visible Emissions			

<sup>\*</sup>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**

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FGRTO. The following indicator operating ranges, or alternate values as established through testing, shall be used to satisfy monitoring in FGRTO. Any changes to the values below shall be updated in the source's Malfunction Abatement Plan.

Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
RTO	Temperature	Minimum 1577°F (3-hour block average)	Continuous	Do not operate the coating processes unless the RTO is within the proper operating range.  In the event of an RTO system fault, the system will shut down and sound an alarm. If the RTO faults and shuts down, all coating operations must be stopped as quickly as possible.  The fault should be examined to determine the cause of the out-of-range reading and a repair determined. After the problem has been fixed, the RTO system must be restarted as per the SSMP to return the unit to operation before coating operations can resume.
Non-PTE for EUSIL01	Stack CFM	CFM greater than <b>2,369</b> (3- hour block average)	Continuous	Do not operate the coating process required to be inside the non-permanent total enclosure unless the exhaust CFM is above the operating limit noted.  If the CFM minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.  In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PTE for EUSIL02	Airflow direction Face Velocity	Toward RTO (into booth)  CFM greater than 236 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless the face velocity is above the operating limit noted. If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.  In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PTE for EUSIL03	Airflow direction Stack CFM	Toward RTO (into booth)  CFM greater than 554 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).  If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.  In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PTE for EUCOE01	Airflow direction	Toward RTO (into booth)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).  If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual

Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
	Stack CFM	CFM greater than <b>296</b> (equivalent to 200 FPM at NDO's) (3- hour block average)		indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.  In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PTE for EUPR1	Airflow direction	Toward RTO (into booth)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).  If the face velocity minimum alarm is activated, maintenance will
	Stack CFM	CFM greater than 174 (equivalent to 200 FPM at NDO's) (3- hour block		determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.  In the event of a malfunction, follow procedures outlined in the Malfunction
PTE for EURC1	Airflow direction	average) Toward RTO (into booth)	Continuous	Abatement Contingency Plan.  Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
	Stack CFM	CFM greater than <b>174</b> (equivalent to 200 FPM at NDO's) (3- hour block		If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.
PTE for	Airflow	average) Toward RTO	Continuous	In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.  Do not operate the coating process required to be inside the permanent
EURC2	direction	(into booth)	Continuous	total enclosure unless it is under negative pressure (airflow into the enclosure).
	Stack CFM	CFM greater than 174 (equivalent to 200 FPM at NDO's) (3- hour block average)		If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.  In the event of a malfunction, follow procedures outlined in the Malfunction
PTE for EURC3	Airflow direction	Toward RTO (into booth)	Continuous	Abatement Contingency Plan.  Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
	Stack CFM	CFM greater than 174 (equivalent to 200 FPM at NDO's) (3- hour block average)		If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.  In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.

# 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-E5094-2018. 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-E5094-2018 is being reissued as Source-Wide PTI No. MI-PTI-E5094-2024.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
49-18A*	202400031	New chain on edge machine to apply	EUSIL01
		adhesives.	EUSIL02
			EUSIL03
			EUSIL04
			EUCOE01
			EUCOE02
			EUPR1
			EURC1
			EURC2
			EURC3
			FGRTO
			FGMMMM

#### **Appendix 7. Emission Calculations**

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

#### 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.