## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

EFFECTIVE DATE: November 2, 2017

**ISSUED TO** 

Lacks Enterprises, Inc.

State Registration Number (SRN): N2079

**LOCATED AT** 

4375 52<sup>nd</sup> Street, Kentwood, Michigan 49512

#### RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N2079-2017

Expiration Date: November 2, 2022

Administratively Complete ROP Renewal Application Due Between May 2, 2021 and May 2, 2022

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

#### SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N2079-2017

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

Michigan Department of Environmental Quality

PTI No: MI-PTI-N2079-2017

## **TABLE OF CONTENTS**

AUTHORITY AND ENFORCEABILITY	5
Section 1 – 52 <sup>nd</sup> Street Paint East; 52 <sup>nd</sup> Street Paint West; 52 <sup>nd</sup> Street Mold; and Barden Distribution	6
A. GENERAL CONDITIONS	7
Permit Enforceability	7
General Provisions	
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	14
C. EMISSION UNIT CONDITIONS	17
EMISSION UNIT SUMMARY TABLE	17
EUPRIMEMANUAL	
EUBASEMANUAL	26
EUCLEARMANUAL	29
D. FLEXIBLE GROUP CONDITIONS	32
FLEXIBLE GROUP SUMMARY TABLE	32
FGEASTPAINT	
FGWESTROBOPAINT	
FGWESTMANUAL	
FGWESTMISPAINT	
FGSUBPARTPPPP	
FGPROCESSHEATERS	
FGNSPSJJJJFGRULE287(2)(c)	
FGRULE290	
FGCOLDCLEANER	
E. NON-APPLICABLE REQUIREMENTS	
APPENDICES	
Appendix 1-1. Acronyms and Abbreviations	_
Appendix 1-1. Actoryms and Abbreviations	
Appendix 2-1. Schedule of Compilance	
Appendix 4-1. Recordkeeping	
Appendix 5-1. Testing Procedures	

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Appendix 6-1. Permits to Install	
Appendix 7-1. Emission Calculations	84
Appendix 8-1. Reporting	
Appendix 9-1. Operation and Maintenance Plan	84
Section 2 - Barden Plating	85
A. GENERAL CONDITIONS	86
Permit Enforceability	
General Provisions	
Equipment & Design	
Emission Limits	
Testing/Sampling	
Monitoring/Recordkeeping	
Certification & Reporting	
Permit Shield	
Reopenings	
Renewals	
Stratospheric Ozone Protection	
Risk Management Plan	
Emission Trading	
Permit to Install (PTI)	
B. SOURCE-WIDE CONDITIONS	93
C. EMISSION UNIT CONDITIONS	96
EMISSION UNIT SUMMARY TABLE	96
EUCONDITIONER	
EUELECTROLESSNI	
EUELECTROLESSCU	
D. FLEXIBLE GROUP CONDITIONS	
FLEXIBLE GROUP SUMMARY TABLE	
FGCHROME1	
FGNEUTCATACC	
FGCOPPER	
FGSEMINICKEL	116
FGBRIMICRONI	118
FGCHROME2	
FGSTRIPTANKS	
FGEMERGENCYRICE-SI	
FGEMERGENCYRICE-CI	
FGBOILERS	
E. NON-APPLICABLE REQUIREMENTS	
APPENDICES	_
Appendix 1-2. Acronyms and Abbreviations	
Appendix 2-2. Schedule of Compliance	
Appendix 3-2. Monitoring Requirements	
Appendix 4-2. Recordkeeping	
Appendix 5-2 Testing Procedures	141

# ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Appendix 6-2.	Permits to Install	141
Appendix 7-2.	Emission Calculations	141
Appendix 8-2.	Reporting	142
	Operation and Maintenance Plan	

PTI No: MI-PTI-N2079-2017

#### **AUTHORITY AND ENFORCEABILITY**

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

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

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

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

# Section 1 – 52<sup>nd</sup> Street Paint East; 52<sup>nd</sup> Street Paint West; 52<sup>nd</sup> Street Mold; and Barden Distribution

PTI No: MI-PTI-N2079-2017

#### 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.
  - Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
- 5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

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:" (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))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. (R 336.1213(3)(b))

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

#### **Certification & Reporting**

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

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

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))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

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))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### Renewals

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

#### **Stratospheric Ozone Protection**

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

#### **Risk Management Plan**

- 38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 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))

PTI No: MI-PTI-N2079-2017

#### 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, MDEQ.<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, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> (R 336.1201(4))

#### Footnotes:

<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).

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### **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.

PTI No: MI-PTI-N2079-2017

### **SOURCE-WIDE CONDITIONS**

#### **POLLUTION CONTROL EQUIPMENT**

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	249.0 tons per year	12-month rolling time period as determined at the end of each calendar month.	All process equipment at the stationary source including equipment covered by other permits, grand-fathered equipment, and exempt equipment	SC VI.1, VI.2	R 336.1213(2)

#### II. MATERIAL LIMIT(S)

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

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

NA

#### 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 VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data. The VOC content of any other material may be determined from Safety Data Sheet. (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. (R 336.1213(3))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

2. The permittee shall calculate and record the stationary Source-wide emission rates in tons, of volatile organic compounds for each calendar month and each 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep the records using stack test data when available, 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 336.1213(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 8-1

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

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

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

#### IX. OTHER REQUIREMENT(S)

NA

#### Footnotes:

<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).

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

#### C. EMISSION UNIT CONDITIONS

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

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

#### **EMISSION UNIT SUMMARY TABLE**

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPRIMEROBOT1	An automatic spray booth used to apply prime/adhesion prime coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUPRIMEROBOT2	An automatic spray booth used to apply prime/adhesion prime coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUPRIMEMANUAL	A manual spray booth used to apply prime/adhesion prime coatings to plastic parts. Stack ID SV-EASTPRIME.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUBASEROBOT1	An automatic spray booth used to apply base coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUBASEROBOT2	An automatic spray booth used to apply base coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUBASEROBOT3	An automatic spray booth used to apply base coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBASEROBOT4	An automatic spray booth used to apply base coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUBASEMANUAL	A manual spray booth used to apply base coatings to plastic parts. Stack ID SV-EASTBASE.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARROBOT1	An automatic spray booth used to apply clear coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARROBOT2	An automatic spray booth used to apply clear coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARROBOT3	An automatic spray booth used to apply clear coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARROBOT4	An automatic spray booth used to apply clear coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARMANUAL	A manual spray booth used to apply clear coatings to plastic parts. Stack ID SV-EASTCLEAR.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUOVEN	A natural gas-fired cure oven. Stack ID SV-EASTBASECLROVEN.	05/04/1994/ 04/02/2002	FGEASTPAINT
EUEASTSAMPLEBOOTH1	One automatic dry filter sample booth which is used on a limited basis to test coatings on parts. Stack ID SV-SAMPLE-BOOTH1.	05/04/1994	FGRULE287(2)(c) FGSUBPARTPPPP
EUEASTSAMPLEBOOTH2	One manual dry filter sample booth which is used on a limited basis to test coatings on parts. Stack ID SV-SAMPLE-BOOTH2.	04/02/2002	FGRULE287(2)(c) FGSUBPARTPPPP

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWASTESOLVRC	This unit is located at the Paint East facility and consists of a waste solvent distillation unit used for onsite recycling of purge and cleanup solvents.	12/13/1993	FGRULE290 FGSUBPARTPPPP
EUWESTROBOT1	This group consists of one coating airdried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT2	This group consists of one coating airdried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT3	This group consists of one coating airdried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT4	This group consists of one coating airdried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT5	This group consists of one coating airdried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT6	This group consists of one coating airdried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWESTROBOT7	This group consists of one coating airdried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer. Particulate is controlled by a dry mat filter or equivalent technology.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT8	This group consists of one coating airdried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOOVEN	This group consists of one dry off oven. Stack ID SV-OVENWRESIST.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT
EUWESTMANUAL1	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM1.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL2	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM2.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL3	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM3.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL4	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM4.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL5	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM5.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL6	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM6.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL7	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM7.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Emission Unit ID	Emission Unit Description	Installation	Flexible Group ID
Emission onit is	(Including Process Equipment & Control Device(s))	Date/ Modification Date	T TEXABLE GLOUP ID
EUWESTMANUAL8	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM8.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL9	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM9.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL10	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray.  Stack ID SV-MANBOOTHM10.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANOVEN	This unit consists for one paint dry oven for the manual spray booths. Stack ID SV-WTOPCOATOVE.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTSTRIPTANK	This unit consists of one strip tank for masks.	07/07/1994/ 12/09/2010	FGWESTMISPAINT FGSUBPARTPPPP
EUWESTPAINTKITCHEN	This emission unit is the paint mixing room. Stack ID SV-WESTPAINTKITCHEN.	07/07/1994/ 12/09/2010	FGWESTMISPAINT FGSUBPARTPPPP
EUEASTPOWERWASH	One 6.5 mmBtu/hr natural gas fueled process heater.	05/04/1994	FGPROCESSHEATERS
EUSPINELLEHEATER1	One 5.3 mmBtu/hr natural gas fueled process heater.	03/22/2005	FGPROCESSHEATERS
EUSPINELLEHEATER2	One 2.0 mmBtu/hr natural gas fueled process heater.	03/22/2005	FGPROCESSHEATERS
EUWESTMASKWASH1	One 0.75 mmBtu/hr natural gas fueled process heater.	07/07/1994	FGPROCESSHEATERS
EUWESTMASKWASH2	One 0.75 mmBtu/hr natural gas fueled process heater.	07/07/1994	FGPROCESSHEATERS
EUPSVGENSET	One 40 BHP, natural gas fueled, 4 stroke rich burn, spark ignition internal combustion engine designed to provide 20kW of electrical power. Located at the Protective Services Building.	05/22/2014	FGNSPSJJJJ
EUWESTASSEMBLY	Assembly station which uses a silicone and "Super Glue" type adhesive to assemble plastic component parts. The 52 <sup>nd</sup> Street - West facility has (3) assembly work stations using adhesives. Stack ID SV-MANBOOTH-MA1.	NA	FGRULE287(2)(c)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUASSEMBLYOPS	Assembly stations that use adhesive and foam to assemble plastic component parts. The operation consists of seventeen (17) individual workstations located in the Assembly Facility on Barden Drive.	NA	FGRULE290
EUMAINTCLEANER	Small, cold solvent cleaner units used in the maintenance departments to clean machine parts being repaired.	NA	FGCOLDCLEANER

PTI No: MI-PTI-N2079-2017

## EUPRIMEMANUAL EMISSION UNIT CONDITIONS

#### **DESCRIPTION**

A manual spray booth used to apply prime/adhesion prime coatings to plastic parts.

Flexible Group ID: FGEASTPAINT, FGSUBPARTPPPP

#### **POLLUTION CONTROL EQUIPMENT**

NA

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

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	45.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUPRIMEMANUAL	SC VI.3, VI.4	R 336.1702(a)

#### II. MATERIAL LIMIT(S)

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

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

NA

#### 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 VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### VI. MONITORING/RECORDKEEPING

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

- All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and solvent, 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 336.1224, R 336.1225, R 336.1702, R 336.1901)
- 3. The permittee shall keep the following information on a monthly basis for EUPRIMEMANUAL:
  - a. Gallons (with water) of each coating, reducer, and solvent used.
  - b. VOC content (minus water and with water) of each coating as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. 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.
  - e. Hours of operation.

The records shall be kept in the format specified in Appendix 4-1.A and 4-1.B or an alternate format that has been approved by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

- 4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EUPRIMEMANUAL:
  - a. Gallons of each solvent used and reclaimed.
  - b. VOC content, in pounds per gallon, of each solvent used.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. 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 the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

#### See Appendix 4-1

#### 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 8-1

PTI No: MI-PTI-N2079-2017

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

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-EASTPRIME	52 <sup>2</sup>	80.0 <sup>2</sup>	R 336.1702(a)

#### 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).

PTI No: MI-PTI-N2079-2017

## EUBASEMANUAL EMISSION UNIT CONDITIONS

#### **DESCRIPTION**

A manual spray booth used to apply base coatings to plastic parts.

Flexible Group ID: FGEASTPAINT, FGSUBPARTPPPP

#### **POLLUTION CONTROL EQUIPMENT**

NA

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

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	60.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUBASEMANUAL	SC VI.3, VI.4	R 336.1702(a)

#### II. MATERIAL LIMIT(S)

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

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

NA

#### 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 VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### VI. MONITORING/RECORDKEEPING

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

- 1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and solvent, 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 336.1224, R 336.1205, R 336.1702, R 336.1901)
- 3. The permittee shall keep the following information on a monthly basis for EUBASEMANUAL:
  - a. Gallons (with water) of each coating, reducer, and solvent used.
  - b. VOC content (minus water and with water) of each coating as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. 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.
  - e. Hours of operation.

The records shall be kept in the format specified in Appendix 4-1.A and 1-4.B or an alternate format that has been approved by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

- 4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EUBASEMANUAL:
  - a. Gallons of each solvent used and reclaimed.
  - b. VOC content, in pounds per gallon, of each solvent used.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. 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 the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

#### See Appendix 4-1

#### 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 8-1

PTI No: MI-PTI-N2079-2017

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

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-EASTBASE	52 <sup>2</sup>	80.0 <sup>2</sup>	R 336.1702(a)

#### 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).

PTI No: MI-PTI-N2079-2017

## EUCLEARMANUAL EMISSION UNIT CONDITIONS

#### **DESCRIPTION**

A manual spray booth used to apply clear coatings to plastic parts.

Flexible Group ID: FGEASTPAINT, FGSUBPARTPPPP

#### **POLLUTION CONTROL EQUIPMENT**

NA

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

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	30.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUCLEARMANUAL	SC VI.3, VI.4	R 336.1702(a)

#### II. MATERIAL LIMIT(S)

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

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

NA

#### 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 VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### VI. MONITORING/RECORDKEEPING

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

- All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and solvent, 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 336.1224, R 336.1225, R 336.1702, R 336.1901)
- 3. The permittee shall keep the following information on a monthly basis for EUCLEARMANUAL:
  - a. Gallons (with water) of each coating, reducer, and solvent used.
  - b. VOC content (minus water and with water) of each coating as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. 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.
  - e. Hours of operation.

The records shall be kept in the format specified in Appendix 4-1.A and 1-4.B or an alternate format that has been approved by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

- 4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EUCLEARMANUAL:
  - a. Gallons of each solvent used and reclaimed.
  - b. VOC content, in pounds per gallon, of each solvent used.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. 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 the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

#### See Appendix 4-1

#### 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 8-1

PTI No: MI-PTI-N2079-2017

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

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-EASTCLEAR	52 <sup>2</sup>	80.0 <sup>2</sup>	R 336.1702(a)

#### 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).

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

#### D. FLEXIBLE GROUP CONDITIONS

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

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

#### FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGEASTPAINT	A plastic parts coating line consisting of thirteen spray booths located at 52 <sup>nd</sup> Paint East. The coatings applied on the line are prime/adhesion prime, base, and clear coats. The prime coating portion of the line consists of two robotic booths (EUPRIMEROBOT1 & EUPRIMEROBOT2), one manual booth (EUPRIMEMANUAL), and a flashoff area. The basecoat portion of the line consists of four robotic booths (EUBASEROBOT1, EUBASEROBOT2, EUBASEROBOT3, & EUBASEROBOT4), one manual booth (EUBASEMANUAL), and a flashoff area. The clearcoat portion of the line consists of four robotic booths (EUCLEARROBOT1, EUCLEARROBOT2, EUCLEARROBOT3, & EUCLEARROBOT4), one manual booth (EUCLEARMANUAL), a flashoff area, and a natural gas-fired cure oven (EUOVEN). Emissions from all of the robotic booths are captured and controlled by a regenerative thermal oxidizer (RTO). Emissions from each of the manual booths and the oven are directly vented to the outside atmosphere. All booths use down-draft waterwash particulate control.	EUPRIMEROBOT1 EUPRIMEROBOT2 EUPRIMEMANUAL EUBASEROBOT1 EUBASEROBOT3 EUBASEROBOT4 EUBASEMANUAL EUCLEARROBOT1 EUCLEARROBOT2 EUCLEARROBOT3 EUCLEARROBOT4 EUCLEARROBOT4 EUCLEARROBOT4 EUCLEARROBOT4
FGWESTROBOPAINT	This flexible group consists of 8 robot spray booths and 1 dry oven located at the 52 <sup>nd</sup> Paint West facility. The spray emissions are captured and controlled by a single RTO. The booths use dry filters to remove paint overspray.	

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGWESTMANUAL	This group consists of 10 hand spray booths and one paint dry oven located at the 52 <sup>nd</sup> Paint West facility.	EUWESTMANUAL1 EUWESTMANUAL2 EUWESTMANUAL3 EUWESTMANUAL4 EUWESTMANUAL5 EUWESTMANUAL6 EUWESTMANUAL7 EUWESTMANUAL8 EUWESTMANUAL9 EUWESTMANUAL10 EUWESTMANOVEN
FGWESTMISPAINT	The group consists of miscellaneous solvent usage at the 52 <sup>nd</sup> Paint West Facility.	EUWESTSTRIPTANK EUWESTPAINTKITCHEN
FGSUBPARTPPPP	Each new, reconstructed, and existing affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP (40 CFR), 63.4481(a)(2) to (5). This includes equipment covered by other permits, grandfathered equipment, and exempt equipment. Surface coating is defined by 40 CFR 63.4481 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.	EUPRIMEROBOT1 EUPRIMEROBOT2 EUPRIMEMANUAL EUBASEROBOT1 EUBASEROBOT3 EUBASEROBOT3 EUBASEROBOT4 EUBASEMANUAL EUCLEARROBOT1 EUCLEARROBOT2 EUCLEARROBOT3 EUCLEARROBOT4 EUCLEARROBOT4 EUCLEARROBOT4 EUCLEARROBOT4 EUCLEARMANUAL EUEASTSAMPLEBOOTH1 EUEASTSAMPLEBOOTH1 EUWASTESOLVRC EUWESTROBOT1 EUWESTROBOT2 EUWESTROBOT3 EUWESTROBOT5 EUWESTROBOT5 EUWESTROBOT6 EUWESTROBOT7 EUWESTROBOT7 EUWESTROBOT8 EUWESTMANUAL1 EUWESTMANUAL1 EUWESTMANUAL2 EUWESTMANUAL5 EUWESTMANUAL5 EUWESTMANUAL6 EUWESTMANUAL6 EUWESTMANUAL8 EUWESTMANUAL9 EUWESTMANUAL10

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGSUBPARTPPPP (cont.)	(cont.)	EUWESTMANOVEN EUWESTSTRIPTANK EUWESTPAINTKITCHEN
FGPROCESSHEATERS	This group consists of 5 existing natural gas fueled process heaters with capacities of 6.5, 5.3, 2.0, 0.75 and 0.75 mmBtu/hr respectively.	EUEASTPOWERWASH, EUSPINELLEHEATER1, EUSPINELLEHEATER2, EUWESTMASKWASH1, EUWESTMASKWASH2
FGNSPSJJJJ	Requirements for any new spark ignition emergency engine that commenced construction after June 12, 2006 and was manufactured on or after January 1, 2009 at major sources of Hazardous Air Pollutants per 40 CFR Part 60 Subpart JJJJ	EUPSVGENSET
FGRULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a and 287(2)(c).	
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	EUWASTESOLVRC, EUASSEMBLYOPS
FGCOLDCLEANER	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.	EUMAINTCLEANER

PTI No: MI-PTI-N2079-2017

## FGEASTPAINT FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

A plastic parts coating line consisting of thirteen spray booths. The coatings applied on the line are prime/adhesion prime, base, and clear coats. The prime coating portion of the line consists of two robotic booths (EUPRIMEROBOT1 & EUPRIMEROBOT2), one manual booth (EUPRIMEMANUAL), and a flashoff area. The basecoat portion of the line consists of four robotic booths (EUBASEROBOT1, EUBASEROBOT2, EUBASEROBOT3, & EUBASEROBOT4), one manual booth (EUBASEMANUAL), and a flashoff area. The clearcoat portion of the line consists of four robotic booths (EUCLEARROBOT1, EUCLEARROBOT2, EUCLEARROBOT3, & EUCLEARROBOT4), one manual booth (EUCLEARMANUAL), a flashoff area, and a natural gas-fired cure oven (EUOVEN). Emissions from all of the robotic booths are captured and controlled by a regenerative thermal oxidizer (RTO). Emissions from each of the manual booths and the oven are directly vented to the outside atmosphere. All booths use down-draft water wash particulate control. Compliance Assurance Monitoring applies to this flexible group.

**Emission Units:** EUPRIMEROBOT1, EUPRIMEROBOT2, EUPRIMEMANUAL, EUBASEROBOT1, EUBASEROBOT2, EUBASEROBOT3, EUBASEROBOT4, EUBASEMANUAL, EUCLEARROBOT1, EUCLEARROBOT2, EUCLEARROBOT3, EUCLEARROBOT4, EUCLEARMANUAL, EUOVEN

#### **POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer, Water Wash Particulate Control

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirement s
1. VOC	45.0 pounds per hour <sup>1</sup>	Hourly	FGEASTPAINT	SC V.1	R 336.1225
2. VOC	11.1 tons per month <sup>2, 3</sup>	As determined at the end of each calendar month.	FGEASTPAINT	SC VI.9, VI.11	R 336.1220 R 336.1702(a)
3. VOC	111.61 tons per year <sup>2, 3</sup>	365-day rolling time period as determined at the end of each calendar day	FGEASTPAINT	SC VI.8, VI.10	R 336.1205 R 336.1220 R 336.1702(a)

#### II. MATERIAL LIMIT(S)

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

PTI No: MI-PTI-N2079-2017

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

1. All waste coatings, reducers, and solvents shall be captured and stored in closed containers and shall be disposed of in an acceptable manner in compliance with all applicable rules and regulations.<sup>2</sup> (R 336.1224, R 336.1702(a))

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

- 1. The permittee shall not operate any spray booth portion of FGEASTPAINT unless its respective waterwash particulate control is installed and operating in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1901, R 336.1910)
- 2. The permittee shall not operate any robotic spray booth portion of FGEASTPAINT unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC capture efficiency of 100 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of 1400 °F and a minimum retention time of 0.5 seconds.<sup>2,3</sup> (R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.1910)
- 3. The permittee shall equip and maintain all basecoat and clearcoat spray booth portions of FGEASTPAINT with electrostatic applicators or equivalent technology with comparable transfer efficiency.<sup>2,3</sup> (R 336.1220, R 336.1702)
- 4. The permittee shall equip and maintain all electrostatic applicator portions of FGEASTPAINT with a device to prevent electric current from being shut off except by authorized personnel.<sup>2,3</sup> (R 336.1220, R 336.1702)

#### V. TESTING/SAMPLING

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

- 1. Within five years from issuance of this ROP, the permittee shall verify the destruction efficiency of the regenerative thermal oxidizer, by testing at owner's expense, in accordance with Department requirements. (R 336.1213(3), 40 CFR 64.6(d))
- 2. Within 180 days of ROP issuance and annually thereafter, the permittee shall verify that the direction of air flow at each natural draft opening (NDO) on each robotic booth portion of FGEASTPAINT is into the booth. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. 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. All test methods, plans, and procedures shall be approved by the AQD prior to testing.<sup>2,3</sup> (R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.1910, 40 CFR 64.6(d))
- 3. The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received may be determined from manufacturer's formulation data.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)
- 4. Within one year of ROP issuance and annually thereafter, the permittee shall verify the VOC content of the five most frequently used coatings, plus 2% of the remaining coatings, as received and as applied using federal reference Method 24. The five most frequently used coatings shall be determined based on the previous 12 months from the date of sampling. If at any time, the Method 24 and the manufacturer's formulation values should differ, the highest of the two values shall be used to calculate emissions. (R 336.1213(3))

See Appendix 5-1

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

### 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 monitor, in a satisfactory manner, the temperature in the thermal oxidizer combustion zone on a continuous basis using a thermocouple and paper chart recorder or in a manner and with instrumentation acceptable to the AQD.<sup>2,3</sup> (R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 64.6(c)(1))
- 2. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer combustion zone.<sup>2,3</sup> (R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 64.6(b))
- 3. An excursion occurs under the following circumstances: (40 CFR 64.6(c)(2))
  - a. The RTO combustion chamber temperature is operated below 1400 °F.
  - b. The RTO does not meet the permitted destruction efficiency of 95% by weight.
  - c. The direction of air flow at any natural draft opening (NDO) of a robotic booth is flowing out of the robotic booth rather than into the booth.
- 4. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of FGEASTPAINT (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). An interlock system shuts down the robotic spray booths if the temperature of the RTO drops below 1400 °F. (40 CFR 64.7(d))
- 5. The permittee shall conduct continuous temperature monitoring while the equipment is operating. 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 emission 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))
- 5. The temperature system of the RTO shall be validated and calibrated on an annual basis by a third party auditor. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 6. At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down the robotic spray booth portion of FGEASTPAINT when the temperature of the 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), 40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 7. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. (40 CFR 64.9(b)(1))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

8. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and solvent, 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, 3</sup> (R 336.1224, R 336.1225, R 336.1702, R 336.1901)

- 9. The permittee shall keep the following information on a daily basis for FGEASTPAINT:
  - a. Gallons (with water) of each coating, reducer, and solvent used.
  - b. VOC content (minus water and with water) of each coating as applied.
  - c. VOC mass emission calculations determining the annual emission rate in tons per 365-day rolling time period as determined at the end of each calendar day.

The records shall be kept in the format specified in Appendix 4-1.A and 1-4.B or an alternate format that has been approved by the AQD District Supervisor.<sup>2, 3</sup> (R 336.1220, R 336.1225, R 336.1702, R 336.1901)

- 10. The permittee shall keep the following information on a monthly basis for FGEASTPAINT:
  - a. Gallons (with water) of each coating, reducer, and solvent used.
  - b. VOC content (minus water and with water) of each coating as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. Hours of operation.

The records shall be kept in the format specified in Appendix 4-1.A and 1-4.B or an alternate format that has been approved by the AQD District Supervisor.<sup>2, 3</sup> (R 336.1220, R 336.1225, R 336.1702, R 336.1901)

- 11. The permittee shall keep the following information on a daily basis for the use of purge and clean-up solvents associated with FGEASTPAINT:
  - a. Gallons of each solvent used and reclaimed.
  - b. VOC content, in pounds per gallon, of each solvent used.
  - c. VOC mass emission calculations determining the annual emission rate in tons per 365-day rolling time period as determined at the end of each calendar day.

The records shall be kept in the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.<sup>2,3</sup> (R 336.1220, R 336.1225, R 336.1702, R 336.1901)

- 12. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with FGEASTPAINT:
  - a. Gallons of each solvent used and reclaimed.
  - b. VOC content, in pounds per gallon, of each solvent used.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.

The records shall be kept in the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.<sup>2,3</sup> (R 336.1225, R 336.1702, R 336.1901)

- 13. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- 14. On an annual basis, the permittee shall inspect and document the internal and external structural integrity of the regenerative thermal oxidizer to ensure proper operation as documented in the Operation and Maintenance Plan. (40 CFR 64.6(c))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

15. The permittee shall comply with all elements of the approved Compliance Assurance Monitoring Plan. (40 CFR 64.9)

See Appendix 4-1

## VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))
- 7. 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))
- 8. 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 8-1

PTI No: MI-PTI-N2079-2017

## VIII. STACK/VENT RESTRICTION(S)

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

	Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. \$	SV-EASTPRIME	52 <sup>2</sup>	80.0 <sup>2</sup>	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
2. \$	SV-EASTBASE	52 <sup>2</sup>	80.02	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
3. \$	SV-EASTCLEAR	52 <sup>2</sup>	80.02	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
4. \$	SV-REGENINCIN5	482	45.0 <sup>2</sup>	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
5. \$	SV-EASTBASECLROVEN	36 <sup>2</sup>	45.0 <sup>2</sup>	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

## IX. OTHER REQUIREMENT(S)

- 1. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))
- 2. The permittee shall, at all times, maintain the monitoring system, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (40 CFR 64.7(b))
- 3. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)
- 4. The permittee shall maintain and operate FGEASTPAINT according to the procedures outlined in the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor. See Appendix 9-1.2 (R 336.1910)

#### See Appendix 9-1

#### 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).
- <sup>3</sup>This condition was established pursuant to Rule 220 as it applied at the time of permitting in 2005. This limit was established under Non-attainment New Source Review which required LAER and emission offsets for VOC's. Rule 220 has been rescinded, and the current equivalent rule is R 336.1908.

PTI No: MI-PTI-N2079-2017

# FGWESTROBOPAINT FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

This group consists of eight (8) coating spray booths used to coat plastic parts and one (1) oven located at the 52<sup>nd</sup> Paint West facility. Compliance Assurance Monitoring applies to this flexible group.

**Emission Units**: EUWESTROBOT1, EUWESTROBOT2, EUWESTROBOT3, EUWESTROBOT4, EUWESTROBOT5, EUWESTROBOT6, EUWESTROBOT7, EUWESTROBOT8, EUWESTROBOVEN

## **POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer, Dry Mat Filters

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

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	80 pounds per day <sup>2</sup>	Based upon a 24- hour averaging period as determined at the end of each 24- hour production day.	FGWESTROBOPAINT	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
2. VOC	1.0 tons per month <sup>2</sup>	As determined at the end of each calendar month.	FGWESTROBOPAINT	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
3. VOC	11.7 tons per year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGWESTROBOPAINT	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21

## II. MATERIAL LIMIT(S)

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

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall equip and maintain all paint spray booths with High Volume Low Pressure spray guns or equivalent technology with comparable transfer efficiency.<sup>2</sup> (R 336.1702(a), R 336.2810, 40 CFR 52.21)
- 2. The permittee shall not operate any of the eight automatic spray booths unless the dry filters are installed and operating properly.<sup>2</sup> (R 336.1224, R 336.1901, R 336.1910)
- 3. The permittee shall not operate any of the eight automatic spray booths unless the thermal incinerator is installed and operating properly. Proper operation of the thermal incinerator includes a minimum VOC destruction efficiency of 95% (by weight) and maintaining a minimum operating temperature of 1400 °F and a minimum retention time of 0.5 seconds.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
- 4. All waste paints, reducers, catalysts, purge solvents, and cleanup solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
- 5. The permittee shall recover and reclaim, recycle or dispose of, in accordance with applicable regulations, a minimum of 90% by weight of all purge and cleanup solvents.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)

## 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. Within five years from issuance of this ROP verification of the destruction efficiency of the regenerative thermal oxidizer, by testing at owner's expense, in accordance with Department requirements, will be required.2 (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(d))
- 2. Verification that the direction of air flow at each natural draft opening (NDO) on each robotic booth in FGWESTROBOPAINT is into the booth, by testing at owner's expense, in accordance with Department requirements, will be required on a semiannual basis. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. The permittee shall submit a notice of the anticipated test date to the AQD District Supervisor no later than two weeks prior to the test date. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 30 days following the last date of the test. After two consecutive tests demonstrating that the direction of air flow at all NDOs is into the booths, the permittee may request that the monitoring schedule be revised to a less frequent time period as approved by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(d))
- 3. At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down the robotic spray booth portion of FGWESTROBOPAINT when the temperature of the 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), 40 CFR 64.6(c)(3), 40 CFR 64.7(d))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

4. The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received may be determined from manufacturer's formulation data.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21)

5. Within one year of ROP issuance and annually thereafter, the permittee shall verify the VOC content of the three most frequently used coatings as received and as applied using federal reference Method 24. The three most frequently used coatings shall be determined based on the previous 12 months from the date of sampling. 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 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)

#### See Appendix 5-1

## 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 the following records:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
  - a. Monthly records for each coating sprayed:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
    - i. The amount in gallons of coating applied.
    - ii. The VOC content in pounds per gallon of coating (minus water) as received and as applied.
    - iii. The VOC content in pounds per gallon of reducers and catalysts and the amounts in gallons applied.
  - b. Monthly records for each purge and cleaning solvent used:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
    - i. The amount in gallons of solvent used.
    - ii. The amount in gallons of solvent reclaimed.
    - iii. The percentage (by weight) of solvents reclaimed.
    - iv. The VOC content in pounds per gallon of coating as used.
  - c. VOC emission calculations determining the VOC mass emissions for each calendar month in tons per month and a 12-month rolling time period average mass emission at the end of each calendar month in tons per year.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
  - d. VOC emission calculations determining the VOC emission rate in pounds per day based upon a 24-hour averaging period and determined at the end of each 24-hour production day.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
- 2. An excursion occurs under the following circumstances:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(c)(2))
  - a. The RTO combustion chamber temperature is operated below 1400 °F.
  - b. The RTO does not meet the permitted destruction efficiency of 95% by weight.
  - c. The direction of air flow at any natural draft opening (NDO) of a robotic booth is flowing out of the robotic booth rather than into the booth.
- 3. The permittee shall restore operation of FGWESTROBOPAINT including the control device and capture system to 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). An interlock system shuts down the robotic spray booths if the temperature of the RTO drops below 1400 °F.² (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.7(d))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

4. The permittee shall monitor, in a satisfactory manner, the temperature in the thermal oxidizer combustion zone on a continuous basis using a thermocouple and paper chart recorder or in a manner and with instrumentation acceptable to the AQD.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(c)(1))

- 5. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer combustion zone.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(b))
- 6. The temperature system of the RTO shall be validated and calibrated on an annual basis by a third party auditor. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 7. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained under 40 CFR Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). (40 CFR 64.9(b))
- 8. On an annual basis, the permittee shall inspect and document the internal and external structural integrity of the regenerative thermal oxidizer to ensure proper operation as documented in the Operation and Maintenance Plan. (40 CFR 64.6(c))
- 9. 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 emission 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))
- 10. The permittee shall comply with all elements of the approved Compliance Assurance Monitoring Plan. (40 CFR 64.9)

## VII. REPORTING

- 1. Prompt reporting of deviations, including exceedances and excursions pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii), 40 CFR 64.9)
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be postmarked or received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.<sup>2</sup> (R 336.2001(3))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.<sup>2</sup> (R 336.2001(4))

- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.<sup>2</sup> (R 336.2001(5))
- 7. 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))
- 8. 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 8-1

## VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-REGENINCIN	422	512	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
2. SV-OVENWRESIST	142	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)

## IX. OTHER REQUIREMENT(S)

- 1. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))
- 2. The permittee shall, at all times, maintain the monitoring system, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (40 CFR 64.7(b))
- 3. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation at all times that the pollutant-specific emissions unit operating. (40 CFR 64.7(c))
- 4. The permittee shall comply with all requirements of 40 CFR Part 64. (40 CFR Part 64)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

5. The permittee shall maintain and operate FGWESTROBOPAINT according to the procedures outlined in the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor. See Appendix 9-1. (R 336.1213(3))

## See Appendix 9-1

#### Footnotes:

<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).

PTI No: MI-PTI-N2079-2017

## FGWESTMANUAL FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

The group consists of (10) manual spray coat booths used to coat plastic parts and one (1) oven located at Lacks 52<sup>nd</sup> Paint West Paint facility.

**Emission Units:** EUWESTMANUAL1, EUWESTMANUAL2, EUWESTMANUAL3, EUWESTMANUAL4, EUWESTMANUAL5, EUWESTMANUAL6, EUWESTMANUAL7, EUWESTMANUAL8, EUWESTMANUAL9, EUWESTMANUAL10, EUWESTMANOVEN

## **POLLUTION CONTROL EQUIPMENT**

**Dry Mat Filters** 

## I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	460 pounds per day <sup>2</sup>	Based upon a 24- hour averaging period as determined at the end of each 24-hour production day.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
2. VOC	5.8 tons per month <sup>2</sup>	As determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
3. VOC	70.0 tons per year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
4. VOC Red and black air-dried coatings	5.75 pounds per gallon of coating, minus water, as applied <sup>2</sup>	Based upon a calendar day averaging time period as determined at the end of each calendar day.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
5. VOC Non-red and black air-dried coatings	5.0 pounds per gallon of coating, minus water, as applied <sup>2</sup>	Based upon a calendar day averaging time period as determined at the end of each calendar day.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21

PTI No: MI-PTI-N2079-2017

### II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Exotic colored coatings	A maximum of 10%, by volume, of all coatings applied. <sup>2</sup>	Based upon a 12- month rolling time period as determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall equip and maintain all paint spray booths with High Volume Low Pressure spray guns or equivalent technology with comparable transfer efficiency.<sup>2</sup> (R 336.1702(a), R 336.2810, 40 CFR 52.21)
- 2. The permittee may use conventional air atomized spray guns in the spray coat booths for the application of exotic colors only.<sup>2</sup> (R 336.1702(a), R 336.2810, 40 CFR 52.21)
- 3. The permittee shall not operate any of the ten manual spray booths unless the dry filters are installed and operating properly.<sup>2</sup> (R 336.1224, R 336.1901, R 336.1910)
- 4. The permittee shall dispose of spent filters in a manner that minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1901, R 336.1910)
- 5. The permittee shall not operate the EUWESTMANOVEN portion of FGWESTMANUAL at a temperature in excess of 194 °F.² (R 336.1702(a), R 336.2810, 40 CFR 52.21)
- 6. All waste paints, reducers, catalysts, purge solvents, and cleanup solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
- 7. The permittee shall recover and reclaim, recycle or dispose of, in accordance with applicable regulations, a minimum of 90% by weight of all purge and cleanup solvents.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)

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

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the bake oven temperature on a continuous basis.<sup>2</sup> (R 336.1702(a), R 336.2810, 40 CFR 52.21)

## V. TESTING/SAMPLING

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

 The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received may be determined from manufacturer's formulation data.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

Within one year of ROP issuance and annually thereafter, the permittee shall verify the VOC content of the five most frequently used coatings, plus 2% of the remaining coatings, as received and as applied using federal reference Method 24. The five most frequently used coatings shall be determined based on the previous 12 months from the date of sampling. If at any time, the Method 24 and the manufacturer's formulation values should differ, the highest of the two values shall be used to calculate emissions.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)

## 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:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
  - a. Monthly records for each coating sprayed:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
    - i. The coating identification/coating category (e.g. air-dried red/black coating, air-dried non red/black coating or exotic colors) for each coating used.
    - ii. The amount in gallons of coating applied.
    - iii. The VOC content in pounds per gallon of coating, minus water, as received and as applied based upon a 24- hour averaging period and determined at the end of each 24-hour production day.
    - iv. The VOC content in pounds per gallon of reducers and catalysts and the amounts in gallons applied based upon a 24- hour averaging period and determined at the end of each 24-hour production day.
  - b. Monthly records for each purge and cleaning solvent used:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
    - i. The amount in gallons of solvent used.
    - ii. The amount in gallons of solvent reclaimed.
    - iii. The percentage (by weight) of solvents reclaimed.
    - iv. The VOC content in pounds per gallon of coating as used.
  - c. Average VOC emission calculations determining the uncontrolled pounds per gallon of coating, minus water, as applied for air-dried red/black coatings and air-dried non red/black coatings each calendar day.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
  - d. VOC emission calculations determining the VOC mass emissions for each calendar month in tons per month and a 12-month rolling time period average mass emission at the end of each calendar month in tons per year.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
  - e. VOC emission calculations determining the VOC emission rate in pounds per day based upon a 24-hour averaging period and determined at the end of each 24-hour production day.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
  - f. Calculations determining the percentage of exotic coatings used for each calendar month and a 12-month rolling time period as determined at the end of each calendar month.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
- 2. The permittee shall monitor and record the bake oven temperature on a continuous basis.<sup>2</sup> (R 336.1702(a), R 336.2810, 40 CFR 52.21)
- 3. The permittee shall keep, in a satisfactory manner, continuous records of the bake temperature as required by SC VI.2.<sup>2</sup> (R 336.1702(a), R 336.2810, 40 CFR 52.21)

See Appendix 4-1

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## **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 8-1

## VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-MANBOOTHM1	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
2. SV-MANBOOTHM2	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
3. SV-MANBOOTHM3	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
4. SV-MANBOOTHM4	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
5. SV-MANBOOTHM5	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
6. SV-MANBOOTHM6	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
7. SV-MANBOOTHM7	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
8. SV-MANBOOTHM8	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
9. SV-MANBOOTHM9	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
10. SV-MANBOOTHM10	242	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
11. SV-WTOPCOATOVE	16 <sup>2</sup>	51 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)

## IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain and operate FGWESTMANUAL according to the procedures outlined in the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor. See Appendix 9-1. (R 336.1213(3))

## See Appendix 9-1

#### 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).

PTI No: MI-PTI-N2079-2017

## FGWESTMISPAINT FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

The group consists of miscellaneous solvent usage at the 52<sup>nd</sup> Paint West Facility.

Emission Units: EUWESTSTRIPTANK, EUWESTPAINTKITCHEN

## POLLUTION CONTROL EQUIPMENT

NA

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

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	VOC – strip tank operations	1.4 lbs/hr <sup>2</sup>	24-hour averaging period as determined at the end of each 24-hour production day	EUWESTSTRIPTANK	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
2.	VOC – strip tank operations	2.0 tons/year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUWESTSTRIPTANK	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21

## II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall equip and maintain both the strip tank with a cover. The cover shall be closed whenever the individual unit is not in use.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
- All waste paints and stripping solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)

PTI No: MI-PTI-N2079-2017

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

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

1. The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received shall be determined using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, then the Method 24 results shall be used to determine compliance. (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 maintain records of the following for EUWESTSTRIPTANK:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
  - a. Monthly records for each stripping solvent used:<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
    - i. The amount in gallons used.
    - ii. The amount in gallons reclaimed.
    - iii. The VOC content in pounds per gallon of solvent as used.
  - b. VOC emission calculations determining the VOC mass emissions for each calendar month in tons per month and a 12-month rolling time period average mass emission at the end of each calendar month in tons per year.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)
  - c. VOC emission calculations determining the VOC emission rate in pounds per day based upon a 24- hour averaging period and determined at the end of each 24-hour production day.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)

### 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 8-1

PTI No: MI-PTI-N2079-2017

## VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-WESTSTRIPTANKRM	13 <sup>2</sup>	342	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
2. SV-WESTPAINTKITCHEN	372	342	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (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).

PTI No: MI-PTI-N2079-2017

# FGSUBPARTPPPP FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

Each new, reconstructed, and existing affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 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.

Emission Units: EUPRIMEROBOT1, EUPRIMEROBOT2, EUPRIMEMANUAL, EUBASEROBOT1, EUBASEROBOT2, EUBASEROBOT3, EUBASEROBOT4, EUBASEMANUAL, EUCLEARROBOT1, EUCLEARROBOT2, EUCLEARROBOT3, EUCLEARROBOT4, EUCLEARMANUAL, EUEASTSAMPLEBOOTH1, EUEASTSAMPLEBOOTH2, EUWASTESOLVRC, EUWESTROBOT1, EUWESTROBOT2, EUWESTROBOT3, EUWESTROBOT4, EUWESTROBOT5, EUWESTROBOT6, EUWESTROBOT7, EUWESTROBOT8, EUWESTMANUAL1, EUWESTMANUAL2, EUWESTMANUAL3, EUWESTMANUAL4, EUWESTMANUAL5, EUWESTMANUAL6, EUWESTMANUAL7, EUWESTMANUAL8, EUWESTMANUAL9, EUWESTMANUAL10, EUWESTMANOVEN, EUWESTSTRIPTANK, EUWESTPAINTKITCHEN

## POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer

## I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Organic HAP	0.16 lb per lb of coating solids	12-month rolling time period as determined at the end of each calendar month	Existing - General Use Coating	SC V.1, V.2 SC VI.1 through VI.10	40 CFR 63.4490(b)(1)
2.	Organic HAP	0.26 lb per lb of coating solids	12-month rolling time period as determined at the end of each calendar month	Existing – Thermoplastic Olefin (TPO) Coating	SC V.1, V.2 SC VI.1 through VI.10	40 CFR 63.4490(b)(3)

- 3. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.4490 using at least one of the following three options, which are listed in 40 CFR 63.4491(a) through (c):
  - a. Compliant material option,
  - b. Emission rate without add-on controls option, or
  - c. Emission rate with add-on controls option.

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

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

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 63.4490 at all times. (40 CFR 63.4500(a)(1))

- 5. 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. (40 CFR 63.4500(a)(2)(i))
- 6. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.4490(a) or (b), the permittee may comply separately with each subcategory emission limit, or comply using one of the alternatives in 40 CFR 63.4490(c)(1) or (2). (40 CFR 63.4490(c))

## II. MATERIAL LIMIT(S)

For the compliant materials option, the permittee shall meet the material limits specified in the following table.

	·	Operating Scenario	Equipment	Monitoring/ Testing Method	Applicable Requirements
Each Thinner and/or Additive	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3, VI.5	40 CFR 63.4491(a)
Each Cleaning     Material	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3, VI.5	40 CFR 63.4491(a)

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. 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 PPPP as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.4567. (40 CFR 63.4492(b) and 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 63.4567(a).
Emission capture system that is a PTE according to 40 CFR 63.4565(a).	<ul><li>a. The direction of the air flow at all times must be into the enclosure; 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 inch H <sub>2</sub> O, as established in Method 204 of Appendix M to 40 CFR 51.
Emission capture system that is <u>not</u> a PTE according to 40 CFR 63.4565(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 63.4567(f).

2. 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:

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers. (40 CFR 63.4493(b)(1))

- b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized. (40 CFR 63.4493(b)(2))
- c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials and waste materials must be conveyed from one location to another in closed containers or pipes. (40 CFR 63.4493(b)(3))
- d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents. (40 CFR 63.4493(b)(4))
- e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment. (40 CFR 63.4493(b)(5))

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

- 3. 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. (40 CFR 63.4500(c))
- 4. 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 63.4492 at all times except during periods of startup, shutdown, and malfunction. (40 CFR 63.4500(a)(2)(ii))
- 5. 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 63.4493 at all times. (40 CFR 63.4500(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 FGEASTPAINT and FGWESTROBOPAINT unless the regenerative thermal oxidizers are installed, maintained, and operated in a satisfactory manner. (40 CFR 63.4492(b))

#### 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 63.4541, 40 CFR 63.4551, and/or 40 CFR 63.4561. (40 CFR 63.4541, 40 CFR 63.4551, 40 CFR 63.4561)
- 2. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall conduct each performance test required by 40 CFR 63.4560 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.4564(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h). (40 CFR 63.4564(a))
- 3. The permittee shall conduct each performance test of an emissions capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.4565 and 40 CFR 63.4566. (40 CFR 63.4564(b))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.4541, 40 CFR 63.4551, or 40 CFR 63.4561. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4483 and ends on the last day of the 12th 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. (40 CFR 63.4483, 40 CFR 63.4540, 40 CFR 63.4550, 40 CFR 63.4560)
- 2. The permittee shall keep all records required by 40 CFR 63.4530 in the format and timeframes outlined in 40 CFR 63.4531. (40 CFR 63.4542(d), 40 CFR 63.4552(d), 40 CFR 63.4563(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 40 CFR Part 63, Subpart PPPP, and the documentation supporting each notification report. (40 CFR 63.4530(a))
  - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. (40 CFR 63.4530(b))
  - 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 63.4530(c)(1))
  - d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. (40 CFR 63.4530(c)(2))
  - 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 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. (40 CFR 63.4530(c)(3))
  - For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.4530(c)(4)(i) through (v). (40 CFR 63.4530(c)(4))
  - The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. (40 CFR 63.4530(d))
  - h. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period. (40 CFR 63.4530(e))
  - The mass fraction of coating solids for each coating used during each compliance period. (40 CFR 63.4530(f))
  - The information specified in 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4). (40 CFR 63.4530(g))
  - k. The date, time, and duration of each deviation. (40 CFR 63.4530(h))
  - For the emission rate with add-on controls option, records specified in 40 CFR 63.4530(i)(1) through (8). (40 CFR 63.4530(i))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

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 to 40 CFR Part 63, Subpart PPPP using the applicable method(s) described below: (40 CFR 63.4563(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 the	<ul> <li>Collect the combustion temperature data according to 40 CFR 63.4568(c);</li> </ul>
	combustion temperature limit established according to 40 CFR 63.4567(a).	<ul><li>ii. Reduce the data to 3-hour block averages; and</li></ul>
		ii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
Emission capture system that is a PTE according to 40 CFR 63.4565(a).	<ul> <li>a. The direction of the air flow at all times must be into the enclosure; 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</li> </ul>	i. Collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.4568(g)(1) or the pressure drop across the enclosure according to 40 CFR 63.4568(g)(2); 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 to 40 CFR Part 51.	ii. Maintain the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintain the direction of air flow into the enclosure at all times.
Emission capture system that is not a PTE according to	The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control	<ul> <li>Collect the gas volumetric flow rate or duct static pressure for each capture device according to 40 CFR 63.4568(g);</li> </ul>
40 CFR 63.4565(a).	device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for	ii. Reduce the data to 3-hour block averages; and
	that capture device according to 40 CFR 63.4567(f).	iii. Maintain the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limit.

- 5. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.4490, for each compliance period, using Equation 1 of 40 CFR 63.4541. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.4541(a). **(40 CFR 63.4542)**
- 6. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period according to 40 CFR 63.4551(a) through (g). **(40 CFR 63.4552)**
- 7. 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, for each compliance period according to the procedures in 40 CFR 63.4561. (40 CFR 63.4563)
- 8. During the performance test required by 40 CFR 63.4560, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.4567 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.4492. **(40 CFR 63.4567)**

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

9. 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 63.4568(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.4568(b). **(40 CFR 63.4568)** 

10. 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 PPPP, or to monitor an alternative parameter and comply with a different operating limit. (40 CFR 63.4492(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 compliant material option, the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a) is a deviation that must be reported as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5). (40 CFR 63.4542(b))
- 5. For the emission rate without add-on controls, if the organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490, the permittee shall report this as a deviation as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6). (40 CFR 63.4552(b))
- 6. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(7):
  - a. The organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490; **(40 CFR 63.4563(b))**
  - b. An operating parameter is out of the allowed range; (40 CFR 63.4563(c)(1))
  - c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened; (40 CFR 63.4563(d))
  - d. Deviations from work practice standards occur. (40 CFR 63.4563(e))
- 7. 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 63.4510. (40 CFR Part 63, Subparts A and PPPP)
- 8. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520. 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 63.4490, include a statement that the coating operations were in compliance. (40 CFR 63.4520, 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f))
- 9. 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. (40 CFR 63.4520(b))
- 10. If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified in 40 CFR 63.4520(c). (40 CFR 63.4520(c), 40 CFR 63.10(d))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

### See Appendix 8-1

## VIII. STACK/VENT RESTRICTION(S)

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

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

## IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products. (40 CFR Part 63, Subparts A and PPPP)

### 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).

PTI No: MI-PTI-N2079-2017

## FGPROCESSHEATERS FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

Requirements for existing Gas 1, (Natural Gas only) for existing Boilers and Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These existing boilers or process heaters must comply with this subpart no later than January 31, 2016, except as provided in 40 CFR 63.6(i).

**Emission Units:** EUEASTPOWERWASH, EUSPINELLEHEATER1, EUSPINELLEHEATER2, EUWESTMASKWASH1, EUWESTMASKWASH2

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

Less than 5 MMBtu/hr	EUSPINELLEHEATER2, EUWESTMASKWASH1, EUWESTMASKWASH2
Equal to or greater than	EUEASTPOWERWASH, EUSPINELLEHEATER1
5 MMBtu/hr and less	
than 10 MMBtu/hr	
Equal to or greater than	N/A
10 MMBtu/hr	

## POLLUTION CONTROL EQUIPMENT

NA

## I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

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

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

- 1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler or process heater at the source. (40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)
- 2. The permittee must operate and maintain affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.7500(a)(3))
- 3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. (40 CFR 63.7500(b))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

- 4. The permittee must:
  - a. Complete a tune-up every 5 years (61 months) for boilers/process heaters less than or equal to 5 million Btu per hour. (40 CFR 63.7500(e), 40 CFR 63.7515(d))
  - b. Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. (40 CFR 63.7500(e), 40 CFR 63.7515(d))
  - c. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. (40 CFR 63.7540(a)(10), 40 CFR 63.7515(d))
  - d. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. (40 CFR 63.7540(a)(13))
  - e. Follow the procedures described in SC IX 4.a through SC IX 4.f for all initial and subsequent tune ups. (40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)
  - f. Complete the Initial tune ups on all affected units no later than January 31, 2016, except as provided in 40 CFR 63.7510(j) and 40 CFR 63.7540(a)(13).
- 5. The permittee must complete the one-time energy assessment no later than January 31, 2016. (40 CFR 63.7510(e))

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

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

NA

## VI. MONITORING/RECORDKEEPING

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

- 1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.7555(a)(1))
- 2. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 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(a), (b), and (c))

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60<sup>th</sup> day following the completion of the initial compliance demonstrations

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following information. (40 CFR 63.7545(e))

- a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. (40 CFR 63.7545(e)(1))
- b. Certification(s) of compliance, as applicable, and signed by a responsible official: (40 CFR 63.7545(e)(8))
  - i. This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR Part 63, Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi). (40 CFR 63.7545(e)(8)(i))
  - ii. This facility has had an energy assessment performed according to 40 CFR 63.7530(e). (40 CFR 63.7545(e)(8)(ii))
- 5. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report, according to paragraph (h) of 40 CFR 63.7550, stated in SC VII.7, by the date in Table 9 of 40 CFR Part 63, Subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below. For units that are subject only to a requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.4.a, biennial tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.4.b, or 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.4.c, and not subject to emission limits or operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below, instead of a semiannual compliance report. (40 CFR 63.7550(b))
  - a. The first semiannual compliance report must cover the period beginning on January 31, 2016 and ending on December 31. When submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on January 31, 2016 and ending on December 31 within 1, 2, or 5 years, as applicable, after the compliance date that is specified in 40 CFR 63.7495.
    (40 CFR 63.7550(b)(1))
  - b. The first semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the first calendar half after January 31, 2016. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than March 15. (40 CFR 63.7550(b)(2), 40 CFR 63.7550(b)(5))
  - c. Each subsequent semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. (40 CFR 63.7550(b)(3))
  - d. Each subsequent semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than March 15. (40 CFR 63.7550(b)(4), 40 CFR 63.7550(b)(5))
- 6. The permittee must include the following information in the compliance report. (40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))
  - a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
  - Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
  - c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
  - d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
  - e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.7550(c)(5)(xvii)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

7. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below. (40 CFR 63.7550(h))

a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (http://www.epa.gov/ttn/chief/cedri/index.html), once the XML schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90-days after the form becomes available in CEDRI. (40 CFR 63.7550(h)(3))

See Appendix 8-1

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

- 1. The permittee must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, for existing boilers and process heaters, unless an extension has been granted per 40 CFR 63.6(i). (40 CFR 63.7495(b))
- 2. The permittee must be in compliance with the applicable work practice standards. (40 CFR 63.7505(a))
- 3. For affected sources (as defined in 40 CFR 63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. (40 CFR 63.7515(g))
- 4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: (40 CFR 63.7540(a))
  - a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))
  - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.7540(a)(10)(iii))
  - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any  $NO_x$  requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv))
  - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.7540(a)(10)(v))
  - f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below. (40 CFR 63.7540(a)(10)(vi))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. (40 CFR 63.7540(a)(10)(vi)(A))

- ii. A description of any corrective actions taken as a part of the tune-up. (40 CFR 63.7540(a)(10)(vi)(B))
- iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. (40 CFR 63.7540(a)(10)(vi)(C))
- 5. If the boiler or process heater has a heat input capacity of less than or equal to 5 million Btu per hour, the permittee may delay the burner inspection specified in SC IX 4.a until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. (40 CFR 63.7540(a)(12))

#### Footnotes:

- <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).

PTI No: MI-PTI-N2079-2017

## FGNSPSJJJJ FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

Requirements for any new spark ignition emergency engine that commenced construction after June 12, 2006 and was manufactured on or after January 1, 2009 at major sources of Hazardous Air Pollutants per 40 CFR Part 60 Subpart JJJJ.

Emission Unit: EUPSVGENSET

## POLLUTION CONTROL EQUIPMENT

NA

## I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. HC + NOx	12.1 g/kW-hr	Instantaneous	EUPSVGENSET	SC VI.2	40 CFR 60.4231(c) 40 CFR 90.103
2. NMHC + NOx	11.3 g/hp-hr	Instantaneous	EUPSVGENSET	SC VI.2	40 CFR 60.4231(c) 40 CFR 90.103
3. CO	610 g/hp-hr	Instantaneous	EUPSVGENSET	SC VI.2	40 CFR 60.4231(c) 40 CFR 90.103

#### II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas, in each engine in FGNSPSJJJJ. (40 CFR 60.4230, R336.12313(3))

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

- 1. There is no time limit on the use of emergency stationary RICE in emergency situations. (40 CFR 60.4243(d)(1))
- 2. The permittee may operate each engine in FGNSPSJJJJ for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. (40 CFR 60.4243(d)(2))
- 3. Each engine in FGNSPSJJJJ may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in 40 CFR 60.4243(d)(2). The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity. (40 CFR 60.4243(d)(3))
- 4. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: (40 CFR 60.4243(d)(3)(i))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

- a. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
- b. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
- c. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- d. The power is provided only to the facility itself or to support the local transmission and distribution system.
- e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching.
- 5. The permittee shall operate and maintain each engine in FGNSPSJJJJ such that it meets the emission limits in SC I.1, I.2, and I.3 over the entire life of the engine. (40 CFR 60.4234, 40 CFR 60.4243(b))
- 6. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year, the permittee shall meet the following requirements for FGNSPSJJJJ:
  - a. Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions,
  - b. Keep a maintenance plan and the permittee may only change those engine settings that are permitted by the manufacturer. If you do not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine, and
  - c. Meet the requirements as specified in 40 CFR Part 1068 Subparts A through D.

If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine and be subject to SC III.5. (40 CFR 60.4243(b)(1))

7. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for each engine in FGNSPSJJJJ and shall, to the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 60.4243(b)(2))

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

- 1. Each engine in FGNSPSJJJJ shall be certified to meet the applicable emission standard of 40 CFR 60.4233. The permittee shall install and configure each engine according to the manufacturer's specifications. (40 CFR 60.4243)
- 2. The permittee shall equip and maintain each engine with non-resettable hours meters to track the operating hours. (40 CFR 60.4237)

### 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 keep records of conducted maintenance to demonstrate compliance. (40 CFR 60.4342(a)(1))
- 2. The permittee shall monitor and record the hours of operation of each engine during emergencies and nonemergencies, on a monthly, 12-month rolling, and calendar year basis, in a manner acceptable to the District

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

Supervisor, Air Quality Division. The permittee shall record the time of operation of each engine in FGNSPSJJJJ and the reason it was in operation during that time. (40 CFR 60.4243)

## VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit the following notifications if an engine in FGNSPSJJJJ is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 60.4243(d)(3)(i) the permittee must submit and annual report including the following: (40 CFR 60.4245(e), 40 CFR Part 60, Subparts A and JJJJ)
  - a. The company name and address where the engine is located;
  - b. Date of the report and beginning and ending dates of the reporting period;
  - c. Engine site rating and model year;
  - d. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place;
  - e. Hours spent for operation for the purposes specified in 40 CFR 60.4243(d)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 60.4243(d)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

See Appendix 8-1

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, as they apply to each engine in FGNSPSJJJJ. Compliance with the provisions of Subpart JJJJ ensures compliance with 40 CFR Part 63, Subpart ZZZZ. (40 CFR Part 60 Subparts A & JJJJ, 40 CFR Part 63, Subpart ZZZZ, 40 CFR 63.6590)

## 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).

PTI No: MI-PTI-N2079-2017

# FGRULE287(2)(c) FLEXIBLE GROUP CONDITIONS

### **DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a and 287(2)(c).

Emission Units: EUWESTASSEMBLY, EUEASTSAMPLEBOOTH1, EUEASTSAMPLEBOOTH2

## **POLLUTION CONTROL EQUIPMENT**

NA

## I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 gallons	Per month, as applied, minus water, per emission unit	NA	R 336.1287(2)(c)(i)

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

NA

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Any exhaust system that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. (R 336.1287(2)(c)(ii))

#### V. TESTING/SAMPLING

NA

### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 287(2)(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. (R 336.1213(3))
  - a. Volume of coating used, as applied, minus water, in gallons. (R 336.1287(2)(c)(iii))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

b. Documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. (R 336.1213(3))

## See Appendix 4-1

## 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 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

PTI No: MI-PTI-N2079-2017

# FGRULE290 FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

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

Emission Units: EUWASTESOLVRC, EUASSEMBLYOPS

## **POLLUTION CONTROL EQUIPMENT**

NA

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

- 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. Each 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))

- b. 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))
- c. 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. (R 336.1290(2)(a)(ii)(D))
- e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month. (R 336.1290(2)(a)(ii)(E))
- 3. Each 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 of the following provisions are met: (R 336.1290(2)(a)(iii))

## Section 1 – 52<sup>nd</sup> Street

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(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 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))
    - i. 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 owner or operators 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))

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

NA

#### V. TESTING/SAMPLING

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or 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))

## Section 1 - 52<sup>nd</sup> Street

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

- 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 sufficient 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 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))

#### See Appendix 4-1

#### 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 8-1

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

NA

## IX. OTHER REQUIREMENT(S)

NA

PTI No: MI-PTI-N2079-2017

# FGCOLDCLEANER FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.

**Emission Unit: EUMAINTCLEANER** 

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

- 1. The cold cleaner must meet one of the following design requirements:
  - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(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:

## Section 1 - 52<sup>nd</sup> Street

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

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

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 written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 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 8-1

Section 1 – 52<sup>nd</sup> Street

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## VIII. STACK/VENT RESTRICTION(S)

NA

# IX. OTHER REQUIREMENT(S)

NA

Section 1 – 52<sup>nd</sup> Street

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## **E. NON-APPLICABLE REQUIREMENTS**

At the time of 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).

PTI No: MI-PTI-N2079-2017

# **APPENDICES**

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

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

PTI No: MI-PTI-N2079-2017

## Appendix 2-1. 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 3-1. Monitoring Requirements**

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

## Appendix 4-1. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EUPRIMEMANUAL, EUBASEMANUAL, EUCLEARMANUAL, and FGEASTPAINT. Alternative formats must be approved by the AQD District Supervisor.

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## Appendix 4-1.A

Total VOC emissions for single and two component coatings

TIME PERIOD: Applicator

	А	B *	С	D	E=(AxB)+(CxD)
COATING	GALLONS OF COATING RESIN AS APPLIED	LBS OF VOC/GAL OF RESIN COMPONENT AS APPLIED/MIXED	GAL OF CATALYST USED	LBS OF VOC PER GAL OF CATALYST USED	LBS OF VOC

F = (100- DS)/100
Control Factor DS=destruction eff. %

TOTAL UNCONTROLLED LBS VOC = G = SUM OF ALL E's	G
LBS CONTROLLED VOC = H = G x F	н
Tons VOC emitted this day = $J = H/2000$	J
Tons of VOC's emitted 364 previous days = K	К
Tons of VOC's emitted 365-day rolling period = L = J + K	L
At the end of each production day: Hours/day of operation, coating line = M	М
LBS OF VOC/HOUR - N - H/M	N

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## Appendix 4-1.B

VOC content of solvent-based coatings, no-water, with reducers

		Α	В		С	D		E	F	G=(AxB)+(CxD)+(ExF)
MIX NAME	BASE RESIN DESCRIPTION	BASE RESIN RATIO	LBS OF VOC/GAL OF BASE RESIN	SOLVENT DESCRIPTION	SOLVENT RATIO	LBS OF VOC/ GAL OF SOLVENT	CATALYST DESCRIPTION	CATALYST RATIO	LBS OF VOC PER GAL OF CATALYST	LBS OF VOC/GAL OF MIX AS APPLIED
PMN Number										

# Section 1 – 52<sup>nd</sup> Street

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## Appendix 4-1.C

VOC Purge and Clean-up solvents.

	Α	В	C=(AxB)	D	Е	E=(BxD)	F=(C-E)
DATE	TOTAL CLEAN PURGE USED (GALLONS)	LBS OF VOC/GAL OF CLEAN PURGE	LBS OF VOC USED	TOTAL WASTE (GALLONS)	LBS OF VOC/GAL OF WASTE	LBS OF VOC OF WASTE	LBS OF VOC EMITTED
			_				

TOTAL UNCONTROLLED LBS VOC = G = SUM OF ALL F's	G
Tons VOC emitted this day = $H = G/2000$	н
Tons of VOC's emitted 364 previous days = I	1
Tons of VOC's emitted 365-day rolling period = J = I + H	J
At the end of each production day: Hours/day of operation, coating line = K	к
LBS OF VOC/HOUR = L = H/K	L

PTI No: MI-PTI-N2079-2017

## **Appendix 5-1. Testing Procedures**

The permittee shall use the following federal Reference Test Methods to measure the pollutant emissions for the applicable requirements referenced in FGEASTPAINT, FGWESTROBOPAINT, FGWESTMANUAL, FGWESTMISPAINT, FGSUBPARTPPPP. Any alternatives to the following test methods shall be approved by the Air Quality Division or the U.S. EPA where applicable.

- 1. VOC- Reference Method 25A.
- 2. VOC- Reference Method 24

## Appendix 6-1. 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-N2079-2012. 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-N2079-2012 is being reissued as Source-Wide PTI No. MI-PTI-N2079-2017.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

## **Appendix 7-1. 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 8-1. Reporting

#### A. Annual, Semiannual, and Deviation Certification Reporting

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

#### **B.** Other Reporting

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

## **Appendix 9-1. Operation and Maintenance Plan**

The permittee shall develop and implement an Operation and Maintenance Plan for the facility. At a minimum, this plan shall address the preventative maintenance of the coating lines and associated capture and control systems. Any modifications shall be submitted to the AQD District Supervisor prior to the issuance of this permit. Any modifications and subsequent changes to the plan by the Company shall be promptly submitted to the AQD Grand Rapids District Supervisor.

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

# Section 2 - Barden Plating

PTI No: MI-PTI-N2079-2017

## A. GENERAL CONDITIONS

## **Permit Enforceability**

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

#### **General Provisions**

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

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

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:" (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. (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))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. (R 336.1213(3)(b))

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

## **Certification & Reporting**

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

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

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))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

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))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### Renewals

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

## **Stratospheric Ozone Protection**

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

## **Risk Management Plan**

- 38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 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))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## 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.2 (R 336.1201(8), Section 5510 of Act 451)
- 45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.2 (R 336.1219)
- 46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.2 (R 336.1201(4))

#### Footnotes:

<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).

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## **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.

PTI No: MI-PTI-N2079-2017

## **SOURCE-WIDE CONDITIONS**

## **POLLUTION CONTROL EQUIPMENT**

NA

#### I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. '	OOC	249.0 tons per year	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grand-fathered equipment, and exempt equipment	SC VI.1, VI.2	R 336.1213(2)

## II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

## 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 VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data. The VOC content of any other material may be determined from Safety Data Sheet. (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. (R 336.1213(3))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

2. The permittee shall calculate and record the stationary Source-wide emission rates in tons, of volatile organic compounds for each calendar month and each 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep the records using stack test data when available, 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 336.1213(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 8-2

## VIII. STACK/VENT RESTRICTION(S)

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

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

## IX. OTHER REQUIREMENT(S)

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-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## C. EMISSION UNIT CONDITIONS

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

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

#### **EMISSION UNIT SUMMARY TABLE**

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCONDITIONER	Conditioner tank containing 1,3-dichloro-2-propanol (DCP). This tank is controlled by a packed bed scrubber with mist eliminator. Stack ID SVK-1.	08/22/2005/ 07/5/2017	NA
EUCHROMEETCH1	Chromic acid etch tank containing chromic acid and hydrochloric acid. This tank is controlled by a composite mesh pad scrubber. Stack ID SVK-2	08/22/2005	FGCHROME1
EUCHROMEETCH2	Chromic acid etch tank containing chromic acid and hydrochloric acid. This tank is controlled by a composite mesh pad scrubber. Stack ID SVK-2.	08/22/2005	FGCHROME1
EUCHROMEETCH3	Chromic acid etch tank containing chromic acid and hydrochloric acid. This tank is controlled by a composite mesh pad scrubber. Stack ID SVK-2.	08/22/2005	FGCHROME1
EUNEUTRALIZER	Process tank containing sulfuric acid. Stack ID SVK-3.	08/22/2005	FGNEUTCATACC
EUCATALYST	Process tank containing hydrochloric acid. Stack ID SVK-3.	08/22/2005	FGNEUTCATACC
EUACCELERATOR	Process tank containing hydrochloric acid. Stack ID SVK-3.	08/22/2005	FGNEUTCATACC
EUELECTROLESSNI	This tank can conduct electroless nickel plating and is controlled by a packed bed scrubber with mist eliminators. The tank will either contain either nickel or copper. Stack ID SVK-4.	08/22/2005	NA
EUELECTROLESSCU	This tank can conduct electroless copper plating and is controlled by a packed bed scrubber with mist eliminators. The tank will contain either copper or nickel. Stack ID SVK-4.	08/22/2005	NA

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCOPPERSTRIKE	Copper strike tank containing copper sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER1	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER2	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER 3	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER4	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER5	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUSEMIBRINI1	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-6.	08/22/2005	FGSEMINICKEL
EUSEMIBRINI2	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-6.	08/22/2005	FGSEMINICKEL
EUSEMIBRINI3	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-6.	08/22/2005	FGSEMINICKEL
EUSEMIBRINI4	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-6.	08/22/2005	FGSEMINICKEL
EUSEMIBRINI5	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-5.	08/22/2005	FGSEMINICKEL
EUBRINICKEL1	Brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-7.	08/22/2005	FGBRIMICRONI
EUBRINICKEL2	Brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-7.	08/22/2005	FGBRIMICRONI

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUMICRONI	Micro-porous nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-7.	08/22/2005	FGBRIMICRONI
EUCHROME1	Decorative chrome electroplating tank with composite mesh pad scrubber and fume suppressant for control. Stack ID SVK-8.	08/22/2005	FGCHROME2
EUCHROME2	Decorative chrome electroplating tank with composite mesh pad scrubber and fume suppressant for control. Stack ID SVK-8.	08/22/2005	FGCHROME2
EUCHROME3	Decorative chrome electroplating tank with composite mesh pad scrubber and fume suppressant for control. Stack ID SVK-8.	08/22/2005	FGCHROME2
EUCHROMESTRIP	Chrome strip tank containing sodium hydroxide controlled by a packed bed scrubber with mist eliminators. Stack ID SVK-9.	08/22/2005	FGSTRIPTANKS
EUNITRICSTRIP	Nitric acid strip tank controlled by a packed bed scrubber with mist eliminators. Stack ID SVK-9.	08/22/2005	FGSTRIPTANKS
EUEMERGENCYRICE-SI	42 brake-horsepower, natural gas fueled (spark ignition) emergency generator, installed prior to June 12, 2006.	8/22/2005	FGEMERGENCYRICE-SI
EUEMERGENCYRICE-CI	435 brake-horsepower, diesel fueled (compression ignition) emergency generator, rated at and was installed during the summer of 1999	07/01/1999	FGEMERGENCYRICE-CI
EUBOILER1	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS
EUBOILER2	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS
EUBOILER3	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS
EUBOILER4	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS
EUBOILER5	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS

PTI No: MI-PTI-N2079-2017

# EUCONDITIONER EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Conditioner tank containing 1,3-dichloro-2-propanol (DCP).

Flexible Group ID: NA

## **POLLUTION CONTROL EQUIPMENT**

Packed bed scrubber with mist eliminator.

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

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. 1,3-dichloro- 2-propanol	0.7 pph <sup>2</sup>	Hourly	EUCONDITIONER	SC V.1 SC VI.1, VI.2	R 336.1225 R 336.1702(a)

#### II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUCONDITIONER unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the packed bed scrubber with mist eliminators and the monitoring equipment required to record the pressure drop across the packed bed scrubber.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)

See Appendix 9-2

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

1. The permittee shall not operate EUCONDITIONER unless the packed bed scrubber with mist eliminator is installed, maintained, and operated in a satisfactory manner. Proper operation includes maintaining the pressure drop, the water recirculation rate, and the fresh water feed rate in the ranges specified in the Operation and Maintenance Plan, as approved by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## V. TESTING/SAMPLING

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

1. Within every 48 months from the date of completion of the most recent stack test, the permittee shall verify 1,3-dichloro-2-propanol emission rates from EUCONDITIONER by testing at owner's expense, in accordance with Department requirements.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)

#### See Appendix 5-2

## 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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the pressure drop across the packed bed scrubber.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner devices to monitor and record the scrubber water recirculation rate and the scrubber fresh water feed rate of the packed bed scrubber.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)
- 3. The permittee shall keep records of daily pressure drop of the packed bed scrubber.<sup>2</sup> (R 336.1225, R 336.1702(a))
- 4. The permittee shall keep records of the water recirculation rate and the fresh water feed rate of the packed bed scrubber.<sup>2</sup> (R 336.1225, R 336.1702(a))
- 4. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)

#### See Appendix 9-2

## VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.<sup>2</sup> (R 336.2001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.<sup>2</sup> (R 336.2001(4))
- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.<sup>2</sup> (R 336.2001(5))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## See Appendix 8-2

## VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-1	18 <sup>1</sup>	100¹	R 336.1225

## 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).

PTI No: MI-PTI-N2079-2017

## EUELECTROLESSNI EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Electroless nickel plating tank which is an optional process to the electroless copper identified in EUELECTROLESSCU. Only one or the other is in operation at any one time.

Flexible Group ID: NA

## **POLLUTION CONTROL EQUIPMENT**

Packed bed scrubber with mist eliminator.

## I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Nickel	0.0014 pph <sup>1</sup>	Hourly	EUELECTROLESSNI	SC VI.1	R 336.1225

## II. MATERIAL LIMIT(S)

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

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

1. The permittee shall not operate EUELECTROLESSNI unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the packed bed scrubber with mist eliminators and the monitoring equipment required to record the pressure drop across the packed bed scrubber.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)

See Appendix 9-2

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUELECTROLESSNI unless the packed bed scrubber with mist eliminators is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)

#### V. TESTING/SAMPLING

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

NA

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## 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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop across the packed bed scrubber.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)
- 2. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. (R 336.1213(3))

See Appendix 9-2

## 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 8-2

## VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-4	46¹	60 <sup>1</sup>	R 336.1225

## 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).

PTI No: MI-PTI-N2079-2017

# EUELECTROLESSCU EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Electroless copper plating tank which is an optional process to the electroless nickel identified in EUELECTROLESSNI. Only one or the other is in operation at any one time.

Flexible Group ID: NA

## POLLUTION CONTROL EQUIPMENT

Packed bed scrubber with mist eliminator.

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

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Formaldehyde	2.97 pph <sup>2</sup>	Hourly	EUELECTROLESSCU	SC V.1	R 336.1225 R 336.1702(a)
2.	Methanol	12.2 pph <sup>2</sup>	Hourly	EUELECTROLESSCU	SC V.1	R 336.1225 R 336.1702(a)
3.	VOC	Less than 36 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUELECTROLESSCU	SC VI.2, VI.3, VI.4	R 336.1205(3) R 336.1225 R 336.1702(a)

#### II. MATERIAL LIMIT(S)

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

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

1. The permittee shall not operate EUELECTROLESSCU unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the packed bed scrubber with mist eliminators and the monitoring equipment required to record the pressure drop across the packed bed scrubber.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

2. The permittee shall not operate EUELECTROLESSCU for more than 4746 hours per 12-month rolling time period as determined at the end of each calendar month unless, after testing it is determined that the actual emission rates of formaldehyde and methanol from EUELECTROLESSCU are lower than the emission limits specified in SC I.1-3, then the permittee may use the following equation to determine maximum hours of operation:<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))

a. 71,999 lbs/year / (Actual Formaldehyde emission rate + Actual Methanol emission rate) = maximum hours
of operation

#### See Appendix 9-2

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUELECTROLESSCU unless the packed bed scrubber with mist eliminators is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)

#### V. TESTING/SAMPLING

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

1. Within every 48 months from the date of completion of the most recent stack test thereafter, the permittee shall verify formaldehyde and methanol emission rates from EUELECTROLESSCU by testing at owner's expense, in accordance with Department requirements. (R 336.2001, R 336.2003, R 336.2004 R 336.1213(3))

## See Appendix 5-2

#### 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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop across the packed bed scrubber.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910)
- 2. The permittee shall monitor and record the hours of operation for EUELECTORLESSCU.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))
- 3. The permittee shall keep, in a satisfactory manner, records of the hours of operation of EUELECTROLESSCU, on a 12-month rolling time period basis, as determined at the end of each calendar month.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702, R 336.1910)
- 4. The permittee shall calculate, in a satisfactory manner, the monthly and 12-month rolling time period VOC emission rate from EUELECTROLESSCU.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))
- 5. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. (R 336.1213(3))

#### See Appendix 9-2

#### 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))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.<sup>2</sup> (R 336.2001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.<sup>2</sup> (R 336.2001(4))
- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.<sup>2</sup> (R 336.2001(5))

See Appendix 8-2

## VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-4	46¹	60¹	R 336.1225

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

PTI No: MI-PTI-N2079-2017

## D. FLEXIBLE GROUP CONDITIONS

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

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

## FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCHROME1	This group consists of 3 chrome etch tanks, a chrome conversion unit, and a chrome recovery unit controlled by a common composite mesh pad scrubber.	
FGNEUTCATACC	This group consists of the neutralizer, catalyst, and accelerator process tanks exhausted from a common stack, no emission controls.	
FGCOPPER	This group consists of the copper electroplating tanks which are exhausted by a common stack, no emission controls.	
FGSEMINICKEL	This group consists of 5 semi-brite nickel electroplating tanks which are exhausted by a common stack, no emission controls.	
FGBRIMICRONI	This group consists of the brite and micro-porous electroplating tanks which are exhausted by a common stack, no emission controls	
FGCHROME2	This group consists of the decorative chrome plating tanks and a chrome recovery unit controlled by a composite mesh pad and fume suppressant control.	
FGSTRIPTANKS	This group consists of the chrome strip and nitric acid strip tanks controlled by a packed bed scrubber with a mist eliminator.	EUCHROMESTRIP EUNITRICSTRIP
FGEMERGENCYRICE-SI	All existing emergency spark ignition engines < 500 HP, located at a major source that commenced construction or reconstruction before June 12, 2006. Compliance with the RICE MACT (40 CFR Part 63, Subpart ZZZZ) emission and operating limitations in this table shall be no later than October 19, 2013.	EUEMERGENCYRICE-SI

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGEMERGENCYRICE-CI	All existing emergency compression ignition engines < 500 HP, located at a major source that commenced construction or reconstruction before June 12, 2006. Compliance with the RICE MACT (40 CFR Part 63, Subpart ZZZZ) emission and operating limitations in this table shall be no later than May 3, 2013.	
FGBOILERS	This group consists of 5, 1.8 MMBtu/hr, natural gas- fired boilers	EUBOILER1 EUBOILER2 EUBOILER3 EUBOILER4 EUBOILER5

PTI No: MI-PTI-N2079-2017

# FGCHROME1 FLEXIBLE GROUP CONDITIONS

# **DESCRIPTION**

This group consists of 3 chrome etch tanks, a chrome conversion unit, and a chrome recovery unit controlled by a common composite mesh pad scrubber.

Emission Units: EUCHROMEETCH1, EUCHROMEETCH2, EUCHROMEETCH3

## POLLUTION CONTROL EQUIPMENT

Composite mesh pad scrubber

# I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total Chromium	0.012 milligram per dry standard cubic meter, corrected to 70°F and 29.92 inches Hg¹	Continuous	FGCHROME1	SC V.1	R 336.1225
2. Total Chromium	0.0025 pph <sup>1</sup>	Hourly	FGCHROME1	SC V.1	R 336.1225

## II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGCHROME1 unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the composite mesh pad scrubber system and the monitoring equipment required to record the pressure drop across the composite mesh pad system.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)

See Appendix 9-2

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGCHROME1 unless the composite mesh pad scrubber system is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)

#### V. TESTING/SAMPLING

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

1. Within every 24 months from the date of completion of the most recent stack test thereafter, the permittee shall verify chromium emission rates from FGCHROME1 by testing at owner's expense, in accordance with Department requirements. (R 336.2001, R 336.2001, R 336.2004, R 336.1213(3))

## See Appendix 5-2

## 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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the pressure drop across the composite mesh pad scrubber system on a daily basis.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)
- 2. The permittee shall keep records of daily pressure drop readings.1 (R 336.1224, R 336.1225)
- 3. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. (R 336.1213(3))

#### See Appendix 9-2

## VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.2001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

See Appendix 8-2

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

# VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-2	52 <sup>1</sup>	60 <sup>1</sup>	R 336.1225

# 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).

PTI No: MI-PTI-N2079-2017

# FGNEUTCATACC FLEXIBLE GROUP CONDITIONS

# **DESCRIPTION**

This group consists of the neutralizer, catalyst, and accelerator process tanks exhausted from a common stack, no emission controls.

Emission Units: EUNEUTRALIZER, EUCATALYST, EUACCELERATOR

# **POLLUTION CONTROL EQUIPMENT**

NA

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

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

# II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGNEUTCATACC unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the fan and the monitoring equipment required to monitor the fan operation.<sup>1</sup> (R 336.1225)

See Appendix 9-2

## 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

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## 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 in accordance with the approved Operation and Maintenance Plan. (R 336.1213(3))

See Appendix 9-2

# 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 8-2

# VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-3	42 <sup>1</sup>	60¹	R 336.1225

## 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).

PTI No: MI-PTI-N2079-2017

# FGCOPPER FLEXIBLE GROUP CONDITIONS

# **DESCRIPTION**

This group consists of the copper electroplating tanks which are exhausted by a common stack, no emission controls.

**Emission Units:** EUCOPPERSTRIKE, EUACIDCOPPER1, EUACIDCOPPER2, EUACIDCOPPER3, EUACIDCOPPER4, EUACIDCOPPER5

## POLLUTION CONTROL EQUIPMENT

NA

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

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

# II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

# IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

# V. TESTING/SAMPLING

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

1. The permittee shall not operate FGCOPPER unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the fan and the monitoring equipment required to monitor the fan operation.<sup>1</sup> (R 336.1225)

# See Appendix 9-2

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## 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 in accordance with the approved Operation and Maintenance Plan. (R 336.1213(3))

See Appendix 9-2

#### 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 8-2

# VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-5	52 <sup>1</sup>	60¹	R 336.1225

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

PTI No: MI-PTI-N2079-2017

# FGSEMINICKEL EMISSION UNIT CONDITIONS

# **DESCRIPTION**

This group consists of 5 semi-brite nickel electroplating tanks which are exhausted by a common stack, no emission controls.

Emission Units: EUSEMIBRINI1, EUSEMIBRINI2, EUSEMIBRINI3, EUSEMIBRINI4, EUSEMIBRINI5

## POLLUTION CONTROL EQUIPMENT

NA

## I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Nickel	0.028 pph <sup>1</sup>	Hourly	FGSEMINICKEL	SC V.1	R 336.1225

## II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGSEMINICKEL unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the fan and the monitoring equipment required to monitor the fan operation.<sup>1</sup> (R 336.1225)

See Appendix 9-2

## 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. Within every 48 months from the date of completion of the most recent stack test thereafter, the permittee shall verify nickel emission rates from FGSEMINICKEL by testing at owner's expense, in accordance with Department requirements. (R 336.2001, R 336.2003, R 336.2004, R 336.1213(3))

## See Appendix 5-2

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### 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 in accordance with the approved Operation and Maintenance Plan. (R 336.1213(3))

#### See Appendix 9-2

## VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.2001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

#### See Appendix 8-2

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

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-6	52 <sup>1</sup>	60 <sup>1</sup>	R 336.1225

# 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).

PTI No: MI-PTI-N2079-2017

# FGBRIMICRONI FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

This group consists of the brite and micro-porous electroplating tanks which are exhausted by a common stack, no emission controls

Emission Units: EUBRINICKEL1, EUBRINICKEL2, EUMICRONI

## POLLUTION CONTROL EQUIPMENT

NA

# I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Nickel	0.28 pph <sup>1</sup>	Hourly	FGBRIMICRONI	SC V.1	R 336.1225

# II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGBRIMICRONI unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the fan and the monitoring equipment required to monitor the fan operation.<sup>1</sup> (R 336.1225)

See Appendix 9-2

## 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. Within every 48 months from the date of completion of the most recent stack test thereafter, the permittee shall verify nickel emission rates from FGBRIMICRONI by testing at owner's expense, in accordance with Department requirements. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004))

#### See Appendix 5-2

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### 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 in accordance with the approved Operation and Maintenance Plan.<sup>2</sup> (R 336.1201(3))

2. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal. (R 336.1225(4))

## See Appendix 9-2

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.2001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

## See Appendix 8-2

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

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-7	42 <sup>1</sup>	60¹	R 336.1225

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

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

PTI No: MI-PTI-N2079-2017

# FGCHROME2 FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

This group consists of the decorative chrome plating tanks and a chrome recovery unit controlled by a composite mesh pad and fume suppressant control subject to the Chromium Electroplating NESHAP.

Emission Units: EUCHROME1, EUCHROME2, EUCHROME3

## **POLLUTION CONTROL EQUIPMENT**

Composite mesh pad scrubber and fume suppressant for control.

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

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Total chromium	0.005 milligram per dry standard cubic meter, corrected to 70°F and 29.92 inches Hg <sup>2</sup>		FGCHROME2	SC V.1 SC VI.1, VI.2, VI.3, VI.4, VI.5, VI.6, VI.7	R 336.1225, R 336.1941, 40 CFR Part 63 Subparts A & N
2.	Total chromium	0.0006 pph <sup>1</sup>	Hourly	FGCHROME2	SC V.1 SC VI.4, VI.5, VI.6, VI.7	R 336.1225

## II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate FGCHROME2 unless the chemical fume suppressant is applied in quantities and at a frequency to ensure the surface tension of each tank in FGCHROME2 does not exceed 45 dynes/cm (3.1x10-3 pound-force per foot) at any time during operation.<sup>2</sup> (R 336.1225, R 336.1910)
- 2. The permittee shall maintain and implement the approved Operation and Maintenance Plan. The plan shall contain all information required by 40 CFR 63.342(f)(3)(i), which includes the following:<sup>2</sup> (R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.342(f)(3)(i))
  - a. Operation and maintenance criteria for FGCHROME2, add-on control device(s), and for the process and control device(s) monitoring equipment as well as a standardized checklist to document the operation and maintenance of the equipment;
  - b. The work practice standards for the add-on control device(s) and monitoring equipment;
  - c. Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

d. A systematic procedure for identifying process equipment, add-on control device(s) and monitoring equipment malfunctions and for implementing corrective actions to address such malfunctions.

- 3. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the Preventative Maintenance/Operation and Maintenance/Malfunction Abatement Plan, the permittee shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event. (R 336.1941, 40 CFR 63.342(f)(3)(E)(iv))
- 4. If the Operation and Maintenance Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Operation and Maintenance Plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. (R 336.1941, 40 CFR 63.342(f)(3)(ii))
- 5. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan. (R 336.1941, 40 CFR 63.342(f)(1)(i))
- 6. Malfunction shall be corrected as soon as practical after their occurrence in accordance with the Operation and Maintenance Plan. (40 CFR 63.342(f)(1)(i))

#### See Appendix 9-2

# IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate FGCHROME2 unless the composite mesh pad scrubber system is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.3424)
- 2. The permittee shall equip and maintain the composite mesh pad scrubber system with a differential pressure monitoring device.<sup>2</sup> (R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.343(c))

#### V. TESTING/SAMPLING

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

1. Within every 24 months from the date of completion of the most recent stack test thereafter, the permittee shall verify chromium emission rates from FGCHROME2 by testing at owner's expense, in accordance with Department requirements. (R 336.2001, R 336.2003, R 336.2004, R 336.1213(3))

#### See Appendix 5-2

# 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 monitor, in a satisfactory manner, the surface tension of FGCHROME2.<sup>2</sup> (R 336.1225, R 336.1910)
- 2. The permittee shall perform inspections of the composite mesh pad (CMP) system as follows:<sup>2</sup> (R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.342(d) and 63.343(c))
  - a. Determine pressure drop across the CMP system on a daily basis. If the pressure drop across the control varies by more than ±2 inch of water gauge, from the pressure drop determined during compliance testing, the variation shall be documented, and the operation and maintenance procedures shall be reviewed. Any corrective action shall be documented.

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

b. Visually inspect the CMP system, on a quarterly basis, to ensure there is proper drainage, no chromic acid build up on the pads, and no evidence of chemical attack on the structural integrity of the control device.

- c. Visually inspect the back portion of the mesh pad closest to the fan, on a quarterly basis, to ensure there is no breakthrough of chromic acid mist.
- d. Visually inspect ductwork from tanks to the CMP system, on a quarterly basis, to ensure there are no leaks.
- e. Perform wash-down of composite mesh pads in accordance with manufacturer's recommendations.
- 3. The permittee shall maintain records of inspections required to comply with applicable work practice standards of 40 CFR 63.342(f). Each inspection record shall identify the device inspected, the date, approximate time of inspection, and a brief description of the working condition of the device during the inspection. The permittee shall also record any actions taken to correct the deficiencies found during the inspection.<sup>2</sup> (R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.346)
- 4. The permittee shall keep records of the daily pressure drop.2 (R 336.1941, 40 CFR Part 63.343(c)(1))
- 5. The permittee shall keep records of the surface tension of each tank in FGCHROME2, the amount of chemical fume suppressant added to each tank in FGCHROME2 and the date and time of each addition.<sup>2</sup> (R 336.1225, R 336.1910)
- 6. The permittee shall keep records of all maintenance performed on the chrome electroplating process tank(s), control device, and monitoring equipment. (R 336.1941, 40 CFR 63.346(b)(2))
- 7. The permittee shall keep records of the occurrence, duration, and cause (if known) of each malfunction of the electroplating process, control device, and monitoring equipment. (R 336.1941, 40 CFR 63.346(b)(3))
- 8. The permittee shall keep records of actions taken during periods of malfunction when such actions are inconsistent with the Operation and Maintenance Plan. (R 336.1941, 40 CFR 63.346(b)(4))
- 9. The permittee shall keep records of monitoring data that are used to demonstrate compliance with the standard for decorative chrome electroplating tank(s), including the date and time the data are collected. (R 336.1941, 40 CFR 63.346(b)(8))
- 10. The permittee shall record the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the decorative chrome electroplating process or monitoring equipment. (R 336.1941, 40 CFR 63.346(b)(9))
- 11. The permittee shall record the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the decorative chrome electroplating process or monitoring equipment. (40 CFR 63.346(b)(10))
- 12. The permittee shall record the total decorative chrome electroplating tank(s) operating time. (R 336.1941, 40 CFR 63.346(b)(11))
- 13. The permittee shall perform all applicable monitoring and recordkeeping as outlined in 40 CFR 63.343 and 40 CFR 63.346 for each decorative chrome electroplating tank at the facility. (R 336.1941, 40 CFR 63.343, 40 CFR 63.346)
- 14. The permittee shall monitor emissions and operating and maintenance information in accordance with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and N.<sup>2</sup> (R 336.1941, 40 CFR Part 63, Subparts A & N)
- 15. The permittee shall keep records of emission information and operating and maintenance information to comply with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and N.<sup>2</sup> (R 336.1941, 40 CFR Part 63, Subparts A & N)

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

#### See Appendix 9-2

#### VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing<sup>2</sup>. (R 336.2001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.<sup>2</sup> (R 336.2001(4))
- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.<sup>2</sup> (R 336.2001(5))
- 7. The permittee shall submit the following notifications to the Department in accordance with 40 CFR 63.347: (R 336.1941, 40 CFR 40 CFR 63.347)
  - a. A notification of the date when construction was commenced, submitted no later than 30 calendar days after such date.
  - b. A notification of the actual date of startup of the source, submitted within 30 calendar days after such date.
  - c. Notification of compliance status.
- 8. The permittee shall submit to the AQD a report of ongoing compliance status containing information required in 40 CFR 63.347(g)(3). This report shall be submitted semi-annually if no exceedances occurred during the reporting period and quarterly if exceedances occurred in the reporting period. (R 336.1941, 40 CFR 63.347(g))
- 9. The permittee shall perform all applicable reporting as outlined in 40 CFR 63.347. (R 336.1941, 40 CFR 63.347)

See Appendix 8-2

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

# VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-8	46¹	60 <sup>1</sup>	R 336.1225

# 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 N.2 (R 336.1941, 40 CFR Part 63 Subparts A & N)

#### 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).

PTI No: MI-PTI-N2079-2017

# FGSTRIPTANKS FLEXIBLE GROUP CONDITIONS

# **DESCRIPTION**

This group consists of the chrome strip and nitric acid strip tanks controlled by a packed bed scrubber with a mist eliminator.

Emission Units: EUCHROMESTRIP, EUNITRICSTRIP

# **POLLUTION CONTROL EQUIPMENT**

Packed bed scrubber with mist eliminator

## I. EMISSION LIMIT(S)

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

# II. MATERIAL LIMIT(S)

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

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGSTRIPTANKS unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the packed bed scrubber with mist eliminators and the monitoring equipment required to record the pressure drop across the packed bed scrubber.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)

## See Appendix 9-2

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGSTRIPTANKS unless the packed bed scrubber with mist eliminators is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)

## V. TESTING/SAMPLING

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

NA

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## 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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop across the packed bed scrubber.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1910)
- 2. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. (R 336.1213(3))

See Appendix 9-2

## 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 8-2

# VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-9	46¹	60¹	R 336.1225

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

PTI No: MI-PTI-N2079-2017

# FGEMERGENCYRICE-SI EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Existing emergency spark ignition engines < 500 HP, located at a major source that commenced construction or reconstruction before June 12, 2006. Compliance with the RICE MACT (40 CFR Part 63, Subpart ZZZZ) emission and operating limitations in this table shall be no later than October 19, 2013.

**Emission Unit: EUEMERGENCYRICE-SI** 

# **POLLUTION CONTROL EQUIPMENT**

NA

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

NA

II. MATERIAL LIMIT(S)

NA

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. EUEMERGENCYRICE-SI shall be installed, maintained, and operated in a satisfactory manner. The permittee shall meet the following work practice standards as specified in 40 CFR 63.6602 and 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1. The permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.
  - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.4.
  - b. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first and replace as necessary; and
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the affected source is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. (40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1)

- 2. The permittee must be in compliance with the emission limitations and operating limitations in 40 CFR Part 63, Subpart ZZZZ that apply to the source at all times. (40 CFR 63.6605(a))
- 3. The permittee, at all times, must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.6605(b))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required in Table 2c of 40 CFR Part 63, Subpart ZZZZ. (40 CFR 63.6625(j))

- 5. If the analytical results of the oil analysis program for emergency stationary engines indicate any of the following limits are exceeded, the permittee shall change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 days or before commencing operation, whichever is later. (40 CFR 63.6625(i))
  - a. Total Acid Number increases by more than 2.0 milligrams of potassium hydroxide (KOH) per gram from when the oil was new.
  - b. Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new.
  - c. Percent water content (by volume) is greater than 0.5.
- 6. The permittee shall maintain and operate the stationary RICE per the manufacturer's emission related written instructions or develop a maintenance plan which must provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. (40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6, Item 9)
- 7. The permittee shall minimize the time spent at idle during startup and minimize the startup time of the stationary RICE to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. (40 CFR 63.6625(h))
- 8. The permittee shall not exceed 100 hours per year for maintenance checks and readiness testing. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. (40 CFR 63.6640(f)(1)(ii))
- 9. The permittee may operate the EUEMERGENCYRICE-SI up to 50 hours per year for non-emergency situations but those hours are to be counted towards the 100 hours per year for maintenance and readiness testing. These 50 hours per year for non-emergency situations cannot be used for peak-shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. Up to 15 hours per year can be used as part of a demand response program. (40 CFR 63.6640(f)(1)(iii))

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

1. The permittee shall equip and maintain EUEMERGENCYRICE-SI with a non-resettable hour meter to track the number of operating hours. (40 CFR 63.6625(f))

#### V. TESTING/SAMPLING

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

1. If using the oil analysis program, the permittee shall at a minimum analyze the oil for the Total Acid Number, Viscosity, and percent water. **(40 CFR 63.6625(i))** 

See Appendix 5-2

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep the following records:

- a. Records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. (40 CFR 63.6655(a)(2), 40 CFR 63.6660)
- b. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.6655(a)(5), 40 CFR 63.6660)
- Records to demonstrate continuous compliance with operating limitations in SC III.1. (40 CFR 63.6655(d), 40 CFR 63.6660)
- d. Records of the maintenance conducted to demonstrate the engine and after-treatment control device (if any) were operated and maintained according to the manufacturer's emission related written instructions or developed maintenance plan. (40 CFR 63.6655(e), 40 CFR 63.6660)
- e. Records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation including what classified the operation as emergency and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. (40 CFR 63.6655(f), 40 CFR 63.6660)

## 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 8-2

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

 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 ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. (40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)

## 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).

PTI No: MI-PTI-N2079-2017

# FGEMERGENCYRICE-CI EMISSION UNIT CONDITIONS

## **DESCRIPTION**

Existing emergency compression ignition engines < 500 HP, located at a major source that commenced construction or reconstruction before June 12, 2006. Compliance with the RICE MACT (40 CFR Part 63, Subpart ZZZZ) emission and operating limitations in this table shall be no later than May 3, 2013.

**Emission Unit: EUEMERGENCYRICE-CI** 

# **POLLUTION CONTROL EQUIPMENT**

NA

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

NA

II. MATERIAL LIMIT(S)

NA

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. EUEMERGENCYRICE-CI shall be installed, maintained, and operated in a satisfactory manner. The permittee shall meet the following work practice standards as specified in 40 CFR 63.6602 and 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1. The permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.
  - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.4.
  - b. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first and replace as necessary; and
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the affected source is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. (40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1)

- 2. The permittee must be in compliance with the emission limitations and operating limitations in 40 CFR Part 63, Subpart ZZZZ that apply to the source at all times. (40 CFR 63.6605(a))
- 3. The permittee, at all times, must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.6605(b))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. (40 CFR 63.6625(j))

- 5. If the analytical results of the oil analysis program for emergency stationary CI engines indicate any of the following limits are exceeded, the permittee shall change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 days or before commencing operation, whichever is later. (40 CFR 63.6625(i))
  - a. Total Base Number is less than 30 percent of the Total Base Number of the oil when new.
  - b. Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new.
  - c. Percent water content (by volume) is greater than 0.5.
- 6. The permittee shall maintain and operate the stationary RICE per the manufacturer's emission related written instructions or develop a maintenance plan which must provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. (40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6, Item 9)
- 7. The permittee shall minimize the time spent at idle during startup and minimize the startup time of the stationary RICE to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. (40 CFR 63.6625(h))
- 8. The permittee shall not exceed 100 hours per year for maintenance checks and readiness testing. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. (40 CFR 63.6640(f)(1)(ii))
- 9. The permittee may operate the EUEMERGENCYRICE-CI up to 50 hours per year for non-emergency situations but those hours are to be counted towards the 100 hours per year for maintenance and readiness testing. These 50 hours per year for non-emergency situations cannot be used for peak-shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. Up to 15 hours per year can be used as part of a demand response program. (40 CFR 63.6640(f)(1)(iii))

# IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUEMERGENCYRICE-CI with a non-resettable hour meter to track the number of operating hours. (40 CFR 63.6625(f))

#### V. TESTING/SAMPLING

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

1. If using the oil analysis program, the permittee shall at a minimum analyze the oil for the Total Base Number, Viscosity, and percent water. (40 CFR 63.6625(i))

See Appendix 5-2

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall keep the following records:
  - a. Records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. (40 CFR 63.6655(a)(2), 40 CFR 63.6660)
  - b. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.6655(a)(5), 40 CFR 63.6660)
  - Records to demonstrate continuous compliance with operating limitations in SC III.1. (40 CFR 63.6655(d), 40 CFR 63.6660)
  - d. Records of the maintenance conducted to demonstrate the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. (40 CFR 63.6655(e), 40 CFR 63.6660)
  - e. Records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. (40 CFR 63.6655(f), 40 CFR 63.6660)

## 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 8-2

#### 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 ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. (40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)

#### 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).

PTI No: MI-PTI-N2079-2017

# FGBOILERS FLEXIBLE GROUP CONDITIONS

# **DESCRIPTION**

Requirements for existing Gas 1, (Natural Gas only) for existing Boilers/Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These existing boilers or process heaters must comply with this subpart no later than January 31, 2016, except as provided in 40 CFR 63.6(i).

Emission Units: EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4, EUBOILER5

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

Less than 5 MMBtu/hr	EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4, EUBOILER5
Equal to or greater than	NA
5 MMBtu/hr and less	
than 10 MMBtu/hr	
Equal to or greater than	NA
10 MMBtu/hr	

# **POLLUTION CONTROL EQUIPMENT**

NA

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

NA

## II. MATERIAL LIMIT(S)

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

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

- 1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler or process heater at the source. (40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)
- 2. The permittee must operate and maintain affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.7500(a)(3))
- 3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and SC III.2. (40 CFR 63.7500(b))
- 4. The permittee must:
  - a. Complete a tune-up every 5 years (61 months) for boilers/process heaters less than or equal to 5 million Btu per hour. (40 CFR 63.7500(e), 40 CFR 63.7515(d))
  - b. Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. (40 CFR 63.7500(e), 40 CFR 63.7515(d))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

c. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. (40 CFR 63.7540(a)(10), 40 CFR 63.7515(d))

- d. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. (40 CFR 63.7540(a)(13))
- e. Follow the procedures described in SC IX 4.a through SC IX 4.f for all initial and subsequent tune ups. (40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)
- f. Complete the Initial tune ups on all affected units no later than January 31, 2016, except as provided in 40 CFR 63.7510(j) and 40 CFR 63.7540(a)(13).
- 5. The permittee must complete the one-time energy assessment no later than January 31, 2016. (40 CFR 63.7510(e))

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

# V. TESTING/SAMPLING

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

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.7555(a)(1))
- 2. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 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(a), (b), and (c))

## VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60<sup>th</sup> day following the completion of the initial compliance demonstrations for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following information. (40 CFR 63.7545(e))
  - a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. (40 CFR 63.7545(e)(1))
  - b. Certification(s) of compliance, as applicable, and signed by a responsible official: (40 CFR 63.7545(e)(8))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

i. This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR Part 63, Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi). (40 CFR 63.7545(e)(8)(i))

- ii. This facility has had an energy assessment performed according to 40 CFR 63.7530(e). (40 CFR 63.7545(e)(8)(ii))
- 5. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report, according to paragraph (h) of 40 CFR 63.7550, stated in SC VII.7, by the date in Table 9 of 40 CFR Part 63, Subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below. For units that are subject only to a requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.4.a, biennial tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.4.b, or 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.4.c, and not subject to emission limits or operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below, instead of a semi-annual compliance report. (40 CFR 63.7550(b))
  - a. The first semiannual compliance report must cover the period beginning on January 31, 2016 and ending on December 31. When submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on January 31, 2016 and ending on December 31 within 1, 2, or 5 years, as applicable, after the compliance date that is specified in 40 CFR 63.7495.

    (40 CFR 63.7550(b)(1))
  - b. The first semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the first calendar half after January 31, 2016. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than March 15. (40 CFR 63.7550(b)(2), 40 CFR 63.7550(b)(5))
  - c. Each subsequent semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. (40 CFR 63.7550(b)(3))
  - d. Each subsequent semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than March 15. (40 CFR 63.7550(b)(4), 40 CFR 63.7550(b)(5))
- 6. The permittee must include the following information in the compliance report. (40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))
  - a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
  - b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
  - c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
  - d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
  - e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.7550(c)(5)(xvii)
- 7. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below. **(40 CFR 63.7550(h))** 
  - a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (http://www.epa.gov/ttn/chief/cedri/index.html), once the XML

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90-days after the form becomes available in CEDRI. (40 CFR 63.7550(h)(3))

See Appendix 8-2

# VIII. STACK/VENT RESTRICTION(S)

NA

# IX. OTHER REQUIREMENT(S)

- 1. The permittee must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, for existing boilers and process heaters, unless an extension has been granted per 40 CFR 63.6(i). **(40 CFR 63.7495(b))**
- 2. The permittee must be in compliance with the applicable work practice standards. (40 CFR 63.7505(a))
- 3. For affected sources (as defined in 40 CFR 63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. (40 CFR 63.7515(g))
- 4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: (40 CFR 63.7540(a))
  - a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))
  - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.7540(a)(10)(iii))
  - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any  $NO_x$  requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv))
  - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.7540(a)(10)(v))
  - f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below. (40 CFR 63.7540(a)(10)(vi))
    - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. (40 CFR 63.7540(a)(10)(vi)(A))
    - ii. A description of any corrective actions taken as a part of the tune-up. (40 CFR 63.7540(a)(10)(vi)(B))
    - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. (40 CFR 63.7540(a)(10)(vi)(C))

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

5. If the boiler or process heater has a heat input capacity of less than or equal to 5 million Btu per hour, the permittee may delay the burner inspection specified in SC IX 4.a until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. (40 CFR 63.7540(a)(12))

#### Footnotes:

- <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-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

# 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).

PTI No: MI-PTI-N2079-2017

# **APPENDICES**

Appendix 1-2. Acronyms and Abbreviations

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

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

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022

PTI No: MI-PTI-N2079-2017

## Appendix 2-2. 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 3-2. Monitoring Requirements

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

# Appendix 4-2. 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 5-2. Testing Procedures**

The permittee shall use the following federal Reference Test Methods to measure the pollutant emissions for the applicable requirements referenced in EUCONDITIONER, FGCHROME1, FGBRIMICRONI, FGCHROME2 Any alternatives to the following test methods shall be approved by the Air Quality Division or the USEPA where applicable.

- 1. Formaldehyde Reference Method 316.
- 2. Total Chromium Reference Method 29.
- 3. Hexavalent Chromium Reference Method 306
- 4. Nickel Reference Method 29.
- 5. 1,3 Dichloro-2-propanol Reference Method 18.
- 6. Methanol- Reference Method 308
- 7. VOC Reference Method 25A

# Appendix 6-2. 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-N2079-2012. 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-N2079-2012 is being reissued as Source-Wide PTI No. MI-PTI-N2079-2017.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
157-16	NA	Increase DCP emission limit, increase stack height.	EUCONDITIONER

#### **Appendix 7-2. 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.

ROP No: MI-ROP-N2079-2017 Expiration Date: November 2, 2022 PTI No: MI-PTI-N2079-2017

## Appendix 8-2. Reporting

#### A. Annual, Semiannual, and Deviation Certification Reporting

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

#### **B.** Other Reporting

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

## **Appendix 9-2. Operation and Maintenance Plan**

The permittee shall develop and implement an Operation and Maintenance Plan for the facility. At a minimum, this plan shall address the preventative maintenance of the plating lines and associated capture and control systems. Any modifications shall be submitted to the AQD District Supervisor prior to the issuance of this permit. Any modifications and subsequent changes to the plan by the Company shall be promptly submitted to the AQD Grand Rapids District Supervisor.