

Transmittal

Rex Lane
Kalamazoo District Office
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
7953 Adobe Road
Kalamazoo, MI 49009-5025

April 21, 2023

Re: Renewable Operating Permit (ROP) Renewal Application
MI-ROP-B1677-2018a
Allnex USA, Inc. (SRN B1677)
Kalamazoo, Michigan

Project No. 230062

- FOR REVIEW AND APPROVAL
- FOR YOUR USE
- AS REQUESTED

Sent By: Susan L. Kueieck, PE

COPIES	DATE	DESCRIPTION
1	4/21/2023	ROP) Renewal Application – Allnex USA, Inc., Kalamazoo, Michigan

COMMENTS

A hard copy of the referenced ROP Renewal Application is enclosed for review and approval.

If you have any questions or require additional information, please contact Brandon Phillips, of Allnex, at 269.385.1242 (Brandon.Phillips@allnex.com) or me at 616.464.3721 (slkueieck@fishbeck.com).

By UPS



RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

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

GENERAL INSTRUCTIONS

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

PART A: GENERAL INFORMATION

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

SOURCE INFORMATION

SRN B1677	SIC Code	NAICS Code 325199	Existing ROP Number MI-ROP-B1677-2018a	Section Number (if applicable)
Source Name Allnex USA, Inc.				
Street Address 2715 Miller Road				
City Kalamazoo		State MI	ZIP Code 49001	County Kalamazoo
Section/Town/Range (if address not available)				
Source Description Allnex USA, Inc. is a manufacturer of industrial coating resins and additives.				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

OWNER INFORMATION

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

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

SRN: B1677	Section Number (if applicable):
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PART A: GENERAL INFORMATION (continued)

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

CONTACT INFORMATION

Contact 1 Name Brandon Phillips		Title SHE Manager		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address) Allnex USA, Inc.				
City Kalamazoo	State MI	ZIP Code 49001	County Kalamazoo	Country USA
Phone number 269.385.1242		E-mail address Brandon.Phillips@allnex.com		

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

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name Michael Szoke		Title Site Manager		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address) Allnex USA, Inc.				
City Kalamazoo	State MI	ZIP Code 49001	County Kalamazoo	Country USA
Phone number 269.385.1249		E-mail address michael.szoke@allnex.com		

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

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

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

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

Listing of ROP Application Contents. Check the box for the items included with your application.

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

Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. Yes No

This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. Yes No

This source will meet in a timely manner applicable requirements that become effective during the permit term. Yes No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

Name and Title of the Responsible Official (Print or Type)

Michael Szoke, Site Manager

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.



 Signature of Responsible Official

4/24/2023

 Date

PART C: SOURCE REQUIREMENT INFORMATION

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

C1.	Actual emissions and associated data from all emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?,	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C4.	Has this stationary source added or modified equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO2, VOC, lead) emissions? If Yes , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5.	Has this stationary source added or modified equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes , then a copy must be submitted as part of the ROP renewal application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/>	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-Part C	

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

<p>E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If <u>Yes</u>, identify changes and additions on Part F, Part G and/or Part H.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>E2. For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u>, identify the stack(s) that was/were not reported on applicable MAERS form(s).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If <u>Yes</u>, complete Part F with the appropriate information.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u>, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

Comments:

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

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.
 If Yes, identify the emission units in the table below. If No, go to Part H. Yes No
Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input type="checkbox"/> Rule 287(2)(c) surface coating line		
<input checked="" type="checkbox"/> Rule 290 process with limited emissions	EUMF_III_BLEND, EUMODAFLOW_III, EUMODAFLOW_3000, EUMODAFLOW_6000	05/01/2019

Comments:
 See the marked-up version of the ROP for the proposed FGRULE290 conditions for the Modaflow process (AI-Part G_ROP_Mark-up).

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

SRN:	Section Number (if applicable):
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PART H: REQUIREMENTS FOR ADDITION OR CHANGE

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

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

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

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

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

SRN:

Section Number (if applicable):

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

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

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

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

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



RENEWABLE OPERATING PERMIT APPLICATION

AI-001: ADDITIONAL INFORMATION

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

SRN: B1677	Section Number (if applicable):
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1. Additional Information ID AI -Part C

Additional Information

2. Is This Information Confidential? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C4 - The addition of the Rule 290 sources related to Modaflow in 2019 does not affect the facility's potential to emit (PTE) criteria pollutants because these sources utilize the same equipment included in the ROP as FGZYREZ.

C5 - The addition of the Rule 290 sources related to Modaflow in 2019 does not affect the facility's PTE hazardous air pollutants (HAPs) because these sources utilize the same equipment included in the ROP as FGZYREZ.

C9 - Attached is the Malfunction Abatement Plan (MAP) for FGZYREZ. There is currently no MAP for EUMACT_EEEE; a MAP will be developed if Allnex utilizes the transfer racks for materials which are subject to 40 CFR Part 63, Subpart EEEE.

Page of

Startup, Shutdown, and Malfunction Plan
For
Cyrez Water Scrubber Operation

Approval(s): _____ Safety, Health, Environment (SHE)
Signature on File

_____ Operations Manager
Signature on File

_____ Plant Manger
Signature on File

1. Scope

This is a Startup, Shutdown, and Malfunction Plan (SSMP) for the operation of the Cyrez Water Scrubber 631-006 (scrubber). This SSMP has been prepared in accordance with the requirements of 40 CFR 63, Subpart FFFF for the *Miscellaneous Organic Chemical Manufacturing NESHAP* to address the startup, shutdown, and corrective actions to be taken in the event of a malfunction of the scrubber that would cause an exceedance of the applicable NESHAP emission limit.

2. Responsibility

- 2.1. The Operations Manager, or designee, will maintain this procedure and review it on a triennial basis.
- 2.2. The Operations Manager, or designee, shall initiate this operation and monitor the same until complete.
- 2.3. The Cyrez Process Operator is responsible for the safe execution of this procedure without deviation, unless special circumstances, (approved by the persons responsible) so warrant. All Cyrez Process Operators are qualified and authorized to shut down the process in the event of an emergency.

3. Process Description

- 3.1. The Cyrez process consists of liquid resin transfer, a blender operation, and packaging equipment. Formaldehyde and methanol are present in the liquid resin used to manufacture the Cyrez Resin Powder Concentrate (RPC). During resin transfer and blending operations, formaldehyde and methanol vapors can emit through the Cyrez Resin Storage Tank (110-002) vent, Head Tank (120-004) vent, or the Dust Collector (631-003) exhaust vent tied to the blending/packaging equipment.
- 3.2. A once-pass water scrubber (631-006) is installed to collect the Storage Tank/Head Tank vent stream and the Dust Collector vent stream to reduce the hazardous air pollutants (HAPs) quantity going into the ambient air. The typical operating range for the water flow to the scrubber (631-006) is 25-50 gallons per minute (gpm). The process flow design basis is detailed in Standard Operating Procedure (DOP) CY-031.

4. Definitions

DOP: Detailed Operating Procedure

HAP: Hazardous Air Pollutant. From the FG CYREZ process, the following are HAPs: formaldehyde, and methanol.

Malfunction: any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable

standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 63.2)

NESHAP: National Emission Standards for Hazardous Air Pollutants

SSM: Startup, Shutdown, and Malfunction

SSMP: Startup, Shutdown, and Malfunction Plan; The SSMP describes the methodology by which the water scrubber system is started from a “cold” state to full treatment operation and shutdown from operational status to full cold shutdown.

5. Plan

The SSMP is intended to minimize emissions during startup, shutdown, and malfunctions of the emission control system.

5.1. Startup and Shutdown

There are no known scenarios that may occur during startup or shutdown of the scrubber that would cause the applicable emission standard to be exceeded. Therefore, the SSMP focuses on malfunction.

5.2. Malfunction:

The following sections provide a discussion of the potential malfunctions and the actions that need to be taken to minimize emissions during such an event. NOTE: If a malfunction occurs that is not covered in this SSMP, the SSMP must be revised to include that malfunction within 45 days of the malfunction. Refer to Section 8 for further details regarding revisions.

5.2.1 Scrubber: DOP CY-031 identifies malfunction scenarios which could potentially cause the applicable emission standard to be exceeded and covers the procedures and actions to be taken to minimize emissions during malfunctions. Refer to DOP CY-031 for details.

5.2.2 Piping to Scrubber: The hard piping to the scrubber may potentially leak and must be inspected annually for indication of leaks (§63.2505(b)(1), §63.983(b)). A malfunction may occur if leaks are noticed between annual inspections.

Malfunction	Indicator	Possible Result	Actions to Take
Leak in Hard Piping to Scrubber	Visible, audible, or olfactory indications of leak	A portion of emissions may not be captured by scrubber	If no undue risk, stop all Cyrez process operations including material transfers. (see DOP CY-031 Section 8)

5.3. Applicable Emission Standard:

Renewable Operating Permit and Subpart FFFF require 98% removal of organic HAP from the FGCYREZ process equipment controlled by the scrubber.

5.4. Operating Parameter Indicators:

Renewable Operating Permit requires that the *...permittee shall not operate any equipment in FGCYREZ unless the water scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the water scrubber includes maintaining the water flow rate at or above the rate established during performance testing.*

Refer to performance testing report for required flow rate.

6. Records

Records are required to be maintained for each malfunction for five years (§§63.6(e)(3) and 63.10(b)(2)). These records must include:

- Records for each malfunction which demonstrate that the procedures specified in the SSMP were followed, confirms conformance with the SSMP, and describes the actions taken for that event
- Cause of the malfunction
- When each malfunction happened and how long it lasted
- What was done to correct or repair the malfunctioning equipment
- Whether the current SSMP was followed
- What was done, if anything, that was different from what is in the current SSMP

These records may be in the form of a checklist.

7. Reports

The following reports need to be submitted to the U.S. Environmental Protection Agency (USEPA) with a copy also submitted to the State Agency.

- 7.1. If the SSMP is revised to reflect changes to source operation or procedures, each such revision to the SSMP must be reported in the Semiannual Report required by §63.10(d)(5). Previous versions of the SSMP must be maintained for 5 years and be made available to any regulatory agency upon request (§63.6(e)(3)(v)).
- 7.2. If a malfunction occurs and procedures in the SSMP were correctly followed, the events shall be documented and certified in the next Semiannual Report and must contain the following:
 - Contact name
 - Contact title

- Certifying signature of the owner/operator or other responsible official
- Statement that the current SSMP was followed
- How many malfunctions happened, how long did each the malfunction last, and a brief description of each malfunction. (Note: This information may take the form of a checklist.)

7.3. If a **malfunction occurs and procedures performed did not follow those identified in the SSMP and/or the type of malfunction was not identified in the SSMP and the emission standards were exceeded**, the actions taken and/or the type of malfunction that occurred must be reported by telephone or facsimile within two (2) working days. A letter must be also be postmarked or delivered within seven (7) working days after the end of the malfunction. The letter should include the following information (§§63.6(e)(3)(iv) and 63.10(d)(5)(ii)):

- Contact name
- Contact title
- Certifying signature of the owner/operator or other responsible official
- How the recent malfunction happened
- What actions were taken during the malfunction
- The reasons the current SSMP were not followed
- Whether any emissions and/or parameters that are monitored were higher or different than their allowable values during the malfunction

In such a case, a revision to the SSMP is also required. See Section 8.1.2.

7.4. A Semiannual SSM Report is required documenting if a startup, shutdown, or malfunction event occurred within the most recent semiannual period. There are no known circumstances in which a startup or shutdown event would cause an emission exceedance. If a malfunction caused an emission standard or limitation to be exceeded, this report must be submitted to the USEPA and must contain the following:

- Contact name
- Contact title
- Certifying signature of the owner/operator or other responsible official
- Statement that the current SSMP was followed
- How many malfunctions happened, how long the malfunctions lasted, and a brief description of each malfunction.

8. Revisions

Under certain circumstances, the SSMP must be revised and notifications to the Agency are required (See Section 7 for notification requirements).

8.1. Revisions:

8.1.1 If there are **changes to the operations or to the SSM procedures** since the last SSMP update, the SSMP must be updated (§63.6(e)(viii)).

8.1.2 Revisions to the SSMP are necessary if the current SSMP:

- Does not include instructions for a malfunction that has occurred (§63.6(e)(3)(vii)(A)). Revise SSMP within 45 days of malfunction. Agency may request to see revised SSMP
- Does not include instructions for what needs to be done during a malfunction that are safe procedures and are good air pollution control practices that minimize emissions to the greatest extent (§63.6(e)(3)(vii)(B)). Revise SSMP within 45 days of malfunction. Agency may request to see revised SSMP
- Does not include enough instructions for correcting or repairing the malfunctioning process, air pollution control, or monitoring equipment as quickly as practical (§63.6(e)(3)(vii)(C)). Revise SSMP within 45 days of malfunction. Agency may request to see revised SSMP
- Includes instructions for anything that is *not* a startup, shutdown, or malfunction (§63.6(e)(3)(vii)(D))

8.1.3 Previous versions of the SSMP must be maintained for 5 years and be made available to any regulatory agency upon request (§63.6(e)(3)(v)).

8.2. Notifications & Reporting Associated with Revisions:

8.2.1 If the SSMP is revised, the revision must be reported in the next Semiannual Report (or Renewable Operating Permit [ROP] certification), as described in Section 7.

8.2.2 If the revisions to your SSMP include changes to the scope of activities that are considered to be SSM events or otherwise changes how any emission limit, work practice requirement, or other requirement in Subpart FFFF applies, the revised SSMP is not effective until the permitting authority receives written notice describing these SSMP revisions (§63.6(e)(3)(viii)). Until then, continue following the existing approved SSMP.



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

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

SRN: B1677

Section Number (if applicable):

1. Additional Information ID

AI-Part G_ROP_Mark-up

Additional Information

2. Is This Information Confidential?

Yes No

Attached is the marked-up version of the ROP indicating the proposed addition of the Rule 290 Modaflow processes.

Page of

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

EFFECTIVE DATE: December 6, 2018

REVISION DATE: August 6, 2019

ISSUED TO

Allnex USA, Inc.

State Registration Number (SRN): B1677

LOCATED AT

2715 Miller Road, Kalamazoo, Michigan 49001

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B1677-2018a

Expiration Date: December 6, 2023

Administratively Complete ROP Renewal Application
Due Between June 6, 2022, and June 6, 2023

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to 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-B1677-2018a

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

Rex Lane, Kalamazoo District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Administrative Order USEPA-5-17-113(a)-MI-03 entered on January 25, 2017, between the USEPA and the permittee.

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

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

Emission Limits

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

The grading of visible emissions shall be determined in accordance with Rule 303.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

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

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate: **(R 336.1213(3)(b))**
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which 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 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP: **(R 336.1213(3)(c))**
- a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.
22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
- a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete." The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

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

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

27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not

expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

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

Reopenings

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

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

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

used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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

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
EUBOILER1	Boiler No. 1 (29 MMBTU/hr heat input)	01-15-1971	FGBOILERS FGMACT DDDDD
EUBOILER3	Boiler No. 3 (72 MMBTU/hr heat input)	02-01-1986	FGBOILERS FGMACT DDDDD
EUMFORMCELTK	41,400 gallon methyl formcel storage tank.	08-01-1975	FGMRPT FGMACT_OOO
EUMRECFORMTK	41,400 gallon recycled formaldehyde storage tank.	08-01-1975	FGMRPT FGMACT_OOO
EUNITRICTK	17,400 gallon 67% nitric acid storage tank.	08-01-1975	FGMRPT
EUMELSTOR	Melamine storage and handling, including the melamine unloading blower, the north and south melamine silos, the melamine transfer blower, and the melamine air filters.	08-01-1975	FGMRPT
EUFRMEOHTK	50,000 gallon fresh methanol storage tank.	08-01-1975	FGMRPT FGMACT_OOO
EURECMEOHTK	30,000 gallon recycled methanol storage tank.	08-01-1975	FGMRPT FGMACT_OOO
EURXN	Equipment used in the chemical reaction to form the methylated resin product, including reactors, condensers, tanks, distillation systems, and solids separation equipment, and product recovery equipment. Emissions are controlled by a vapor balance system, methanol scrubber, cryogenic condenser, and a water scrubber.	08-01-1975	FGMRPT FGMACT_OOO
EUCYMELTKA	50,000 gallon Cymel 303 storage tank A	08-01-1975	FGMRPT
EUCYMELTKB	50,000 gallon Cymel 303 storage tank B	08-01-1975	FGMRPT
EUCYREZSTTK	5,000 gallon Cyrez intermediate storage tank. Emissions are controlled by a packed bed water scrubber.	11-12-1986	FGCYREZ
EUCYREZHDTK	350 gallon Cyrez head tank. Emissions are controlled by a packed bed water scrubber.	11-12-1986	FGCYREZ

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCYREZBLND	Ribbon blender for Cyrez product. Emissions controlled by a baghouse that vents to a packed bed water scrubber.	11-12-1986	FGCYREZ
EUCYREZPKG	Surge bins for packaging Cyrez product. Emissions controlled by a baghouse that vents to a packed bed water scrubber.	11-12-1986	FGCYREZ
EUMACT_EEEE	Transfer racks subject to 40 CFR Part 63, Subpart EEEE. Storage tanks are not subject to this subpart, as they are covered under Subpart OOO.	08-01-1975	NA
EUCUMMINS_ENG	335 HP emergency generator	01-01-1977 and 01-01-2002	FGMACT ZZZZ
EUDET_DIESEL_ENG	288 HP emergency generator	01-01-1997	FGMACT ZZZZ
EUCOLDCLEANERS	All cold cleaners at the Facility.	03-24-2014	FGCOLDCLEANERS
<u>EUMF_III_BLEND</u>	<u>Modaflow III resin powder production blending</u>	<u>05-01-2019</u>	<u>FGRULE290</u>
<u>EUMF_3000_BLEND</u>	<u>Modaflow 3000 resin powder production blending</u>	<u>05-01-2019</u>	<u>FGRULE290</u>
<u>EUMF_6000_BLEND</u>	<u>Modaflow 6000 resin powder production blending</u>	<u>05-01-2019</u>	<u>FGRULE290</u>
<u>EUMF_III_PACK</u>	<u>Modaflow III resin powder production packaging</u>	<u>05-01-2019</u>	<u>FGRULE290</u>
<u>EUMF_3000_PACK</u>	<u>Modaflow 3000 resin powder production packaging</u>	<u>05-01-2019</u>	<u>FGRULE290</u>
<u>EUMF_6000_PACK</u>	<u>Modaflow 3000 resin powder production packaging</u>	<u>05-01-2019</u>	<u>FGRULE290</u>
Changes to the equipment described in this Table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

EUMACT_EEEE EMISSION UNIT CONDITIONS

DESCRIPTION

Transfer racks subject to 40 CFR Part 63, Subpart EEEE. Storage tanks are not subject to this subpart, as they are covered under Subpart OOO.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

The permittee shall limit the total actual annual facility-level organic liquid loading volume through transfer racks, excluding maintenance activities, where the total 40 CFR Part 63 Subpart EEEE Table 1 organic HAP content of the organic liquid being loaded through one or more of the transfer rack's arms is at least 98 percent by weight and the material is being loaded into a transport vehicle, to 800,000 gallons.² **(40 CFR Part 63.2346(b), 40 CFR Part 63, Subpart EEEE, Table 2).**

The permittee shall limit the total actual annual facility-level organic liquid containing at least 5 percent organic HAP loading volume through transfer racks, excluding maintenance activities, to less than 10,000,000 gallons.² **(40 CFR Part 63.2346(b), 40 CFR Part 63, Subpart EEEE, Table 2).**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each emission source identified in 40 CFR 63.2338 that does not require control under this subpart, the permittee shall keep all records identified in 40 CFR 63.2343.² **(40 CFR Part 63.2390(a))**
2. For each transfer rack that meets the conditions identified in 40 CFR 63.2343(c), the permittee shall keep documentation, including the records specified in 40 CFR 63.2390(d), that verifies the transfer rack is not required to be controlled under this subpart. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form in a separate location.² **(40 CFR Part 63.2343(c)(3))**

3. The permittee shall keep records of the total actual annual facility-level organic liquid loading volume as defined in 40 CFR 63.2406 through transfer racks to document the applicability, or lack thereof, of the emission limitations in 40 CFR Part 63 Subpart EEEE table 2, items 7 through 10.² **(40 CFR Part 63.2390(d))**
4. The permittee shall keep all records in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form at a separate location.² **(40 CFR Part 63.2394(a))**
5. As specified in 40 CFR 63.10(b)(1), the permittee shall keep all files of all information (including all reports and notifications) for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.² **(40 CFR Part 63.2394(b))**
6. The permittee shall keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee may keep the records off site for the remaining 3 years.² **(40 CFR Part 63.2394(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 shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. For each transfer rack subject to this subpart that loads organic liquids but is not subject to control based on the criteria specified in 40 CFR Part 63 Subpart EEEE Table 2, items 7 through 10, the permittee shall submit the information in 40 CFR 63.2386(c)(1), (2), (3), and (10)(i) in either the Notification of Compliance Status, according to the schedule specified in 40 CFR Part 63 Subpart EEEE Table 12, or a first Compliance report, according to the schedule specified in 40 CFR 63.2386(b), whichever occurs first. **(40 CFR Part 63.2343(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and EEEE, as they apply to transfer racks at the facility, as specified in USEPA Administrative Consent Order EPS-5-17-113(a)-MI-03. In addition to the provisions specified in EUMACT_EEEE, these provisions include: **(40 CFR Part 63, Subparts A and EEEE)**
 - a. Records as required by 40 CFR 63.2390
 - b. A startup, shutdown, and malfunction plan (SSMP) is required by 40 CFR 63.6(e)(3); however, as specified in 40 CFR Part 63 Subpart EEEE Table 12, the 2-day reporting requirement in 40 CFR 63.6(e)(3)(iv) does not apply and 40 CFR 63.6(e)(3) does not apply to emissions sources not requiring control, such as EUMACT_EEEE.

Footnotes:

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

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBOILERS	Natural gas fired boilers.	EUBOILER1 EUBOILER3
FGCYREZ	Batch process: Cyrez production.	EUCYREZSTTK EUCYREZHDTK EUCYREZBLND EUCYREZPKG
FGMRPT	Batch process: Cymel production methylated resins.	EURECFORMTK EUMFORMCELTK EUNITRICTK EUMELSTOR EUFRMEOHTK EURECMEOHTH EURXN EUCYMELTKA EUCYMELTKB
FGMACT DDDDD	Requirements for existing Gas 1 (natural gas only). Boilers at major sources of HAPs per 40 CFR Part 63, Subpart DDDDD.	EUBOILER1 EUBOILER3
FGMACT OOO	Equipment subject to 40 CFR Part 63, Subpart OOO.	EURECFORMTK EUMFORMCELTK EUFRMEOHTK EURECMEOHTK EURXN
FGMACT ZZZZ	Existing emergency generators exempt from Permit to Install requirements pursuant to Rule 285(2)(g) and subject to 40 CFR 63, Subpart ZZZZ.	EUCUMMINS_ENG EUDET_DIESEL_ENG
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h), or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANERS

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	

**FGBOILERS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Natural gas fired boilers.

Emission Units: EUBOILER1 and EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx ^A	0.18 pound per MMBTU heat input ²	Hourly	Each boiler in FGBOILERS	SC V.1 and V.2	R336.1205(3), 40 CFR 52.21(c) and (d)

^A "Nirtogen oxides" means all oxides of nitrogen, determined as nitrogen dioxide.

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in FGBOILERS.² **(R 336.1205, R 336.2802, 40 CFR Part 52.21)**

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. Upon request from the AQD District Supervisor, the permittee may be required to verify the NOx emission rate from either boiler in FGBOILERS testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60 Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1205, R 336.2001, R 336.2003, R 336.2004, 40 CFR Part 52.21 (c) and (d))**
2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

NA

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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVB001	24 ²	50 ²	40 CFR 52.21 (c) and (d)
2. SVB003	48 ²	50 ²	40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

**FGCYREZ
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Batch process: Cyrez production.

Emission Unit: EUCYREZSTTK, EUCYREZHDTK, EUCYREZBLND, EUCYREZPKG

POLLUTION CONTROL EQUIPMENT

Baghouse (631-003) controls emissions from EUCYREZBLND and EUCYREZPKG; water scrubber (631-006) controls emissions from EUCYREZSTTK, EUCYREZHDTK, and the baghouse (631-003).

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.05 pound per 1,000 pounds of exhaust gases on a dry gas basis ²	Hourly	FGCYREZ	SC V.1 and V.2	R336.1331
2. PM	1 pph ²	Hourly	FGCYREZ	SC V.1 and V.2	R 336.1331
3. Organic HAP	98% removal ²	Hourly	FGCYREZ	SC VI.2 and VI.3	43 CFR 63.2460, Table 2 of 40 CFR Part 63 Subpart FFFF
4. VOC	18.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGCYREZ	SC VI.4	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate EUCYREZBLND or EUCYREZPKG unless the baghouse (ID 631-003) is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the baghouse pressure drop in the range specified by the manufacturer.² **(R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall equip and maintain baghouse 631-003 with a pressure drop indicator.² **(R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall not operate any equipment in FGCYREZ unless the water scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the water scrubber includes maintaining the water flow rate at or above the rate established during performance testing.² **(R 336.1702(a), R 336.1910)**

4. The permittee shall equip and maintain the water scrubber with a water flow rate indicator.² **(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. Upon request from the AQD District Supervisor, the permittee may be required to verify the PM emission rates from FGCYREZ testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60 Appendix A or Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1331, R 336.2001, R 336.2003, R 336.2004)**
2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record, in a satisfactory manner, the baghouse 631-003 pressure drop on a daily basis.² **(R 336.1301, R 336.1331, R 336.1910)**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the water flow rate of the water scrubber (631-006) on a continuous basis. Water flow rate data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The water flow rate monitoring device shall be calibrated once per calendar year.² **(R 336.1702(a), R 336.1910)**
3. The permittee shall keep, in a satisfactory manner, records of the water scrubber (631-006) monitored water flow rate, records of the daily average flow rate, and records of all periods when these flow rates are lower than the rate established during performance testing. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1702(a), R 336.1910)**
4. The permittee shall calculate the VOC emission rate from FGCYREZ monthly, for the calendar month and for the 12-month rolling time period ending that calendar month, using a method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1702(a))**

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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCYR631003	22 ²	50 ²	R336.1225, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and FFFF as they apply to the facility. In addition to the provisions specified in FGYZREZ, these provisions include:² **(40 CFR Part 63, Subparts A and FFFF)**
 - a. A Leak Detection Monitoring and Repair (LDAR) Program is not required because all equipment contains HAP at <5 percent content.
 - b. Heat exchange systems monitoring is not required because all equipment contains HAP at <5 percent content.
 - c. By June 26, 2019, the permittee shall submit a proposed startup, shutdown, and malfunction plan to the AQD District Supervisor.
 - d. Notifications, reports and records as required by 40 CFR 63.2515, 40 CFR 63.2520 and 40 CFR 63.2525.

Footnotes:

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

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

**FGMRPT
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Batch process: Cymel production methylated resins.

Emission Units: EURECFORMTK, EUMFORMCELTK, EUNITRICTK, EUMELSTOR, EUFRMEOHTK, EURECMEOHTK, EURXN, EUCYMELTKA, EUCYMELTKB

POLLUTION CONTROL EQUIPMENT

Vapor balance system, methanol scrubber (ID 631-509), and cryogenic condenser (ID 631-516, SVMR631509), water scrubber (ID 631-501, SVMR631501), Bin vent filter (ID 110-021.3A), Bin vent filter (ID 110-021.3B), Baghouse (ID 120-006A.IN), and Baghouse (ID 120-006B.IN)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	49 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGMRPT equipment exhausted through cryogenic condenser 631-516	SC V.1, V.2, V.3, VI.2, VI.4, VI.5, VI.8, VI.9, VI.10, VI.11	R 336.1702(a)
2. VOC	6.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGMRPT equipment exhausted through water scrubber 631-501	SC V.1, V.4, VI.3, VI.5, VI.7	R 336.1702(a)
3. VOC	24.7 pph ²	Hourly	FGMRPT equipment exhausted through cryogenic condenser 631-516 and using recycled methanol in methanol scrubber 631-509 while the outlet vapor temperature is more than -50°C	SC V.1, V.3	R 336.1702(a)
4. VOC	6.1 pph ²	Hourly	FGMRPT equipment exhausted through cryogenic condenser 631-516 and using recycled methanol in methanol scrubber 631-509 while the outlet vapor temperature is -50°C or less	SC V.1, V.2	R 336.1702(a)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
5. VOC	6.1 pph ²	Hourly	FGMRPT equipment exhausted through cryogenic condenser 631-516 and using fresh methanol in methanol scrubber 631-509	SC V.1, V.2	R 336.1702(a)
6. Particulate Matter	0.076 pound per 1,000 pounds of exhaust gases on a dry gas basis ²	Hourly	FGMRPT	SC V.1, V.6	R 336.1224 R 336.1225 R 336.1331
7. Formaldehyde (HCHO)	1.3 pph ¹	Hourly	FGMRPT operations exhausted through the cryogenic condenser	SC V.1, V.5, VI.2	R 336.1225
8. HCHO	0.09 pph ¹	Hourly	FGMRPT operations exhausted through the water scrubber	SC V.1, V.5, VI.7	R 336.1225
9. Methanol (MeOH)	6.1 pph ¹	Hourly	FGMRPT operations exhausted through the cryogenic condenser	SC V.1, V.5 VI.2, VI.8, VI.9, VI.10, VI.11	R 336.1225
10. MeOH	8.0 pph ¹	Hourly	FGMRPT operations exhausted through the water scrubber	SC V.1, V.5, VI.7, VI.8, VI.9, VI.10, VI.11	R 336.1225
11. Melamine	0.54 pph ¹	Hourly	Melamine storage silos loading	SC V.1, V.6	R 336.1224 R 336.1225
12. Melamine	0.09 pph ¹	Hourly	Charge hoppers loading	SC V.1, V.6	R 336.1224 R 336.1225

II. MATERIAL LIMIT(S)

1. The permittee shall not process more than 76.6 million pounds of methylated resin product per year, based on a 12-month rolling time period.² (**R 336.1205, R 336.1224, R 336.1225, R 336.1702(a)**)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the process steps that use nitrogen blankets unless the on-demand nitrogen blanketing system is installed, maintained, and operated in a satisfactory manner.² (**R 336.1225, R 336.1702(a), R 336.1910**)
2. The permittee shall not operate the process steps that use vapor balance unless the vapor balance system is installed, maintained, and operated in a satisfactory manner.² (**R 336.1225, R 336.1702(a), R 336.1910**)
3. The permittee shall not perform reflux operations in the first reactor (ID 120-051) unless the vent receiver tank and vacuum pump are installed, maintained, and operated in a satisfactory manner.² (**R 336.1225, R 336.1702(a), R 336.1910**)
4. The permittee shall not operate the process steps exhausted to the methanol scrubber (ID 631-509) unless the cryogenic condenser (ID 631-516) is installed, maintained, and operated in a satisfactory manner. Operation of the cryogenic condenser in a satisfactory manner includes achieving an outlet vapor temperature after the final condensing step as described below:

- a. When using fresh methanol in the scrubber, -30°C or lower
- b. When using recycled methanol in the scrubber, -50°C or lower, except for 2,351 hours per year, based on a 12-month rolling time period as determined at the end of each calendar month, during which the outlet vapor temperature may be greater than -50°C but shall not exceed -30°C.

When fresh methanol is used in the methanol scrubber, the condenser outlet vapor temperature may be determined using a calendar day average. When recycled methanol is used in the methanol scrubber, the condenser outlet vapor temperature shall be determined on an hourly basis.² **(R 336.1225, R 336.1702(a), R 336.1910)**

- 5. The permittee shall equip and maintain a thermocouple to monitor the outlet temperature of the cryogenic condenser. **(40 CFR 64.6(c)(1)(i and ii))**
- 6. The permittee shall equip and maintain the cryogenic condenser (ID 631-516) with a high outlet vapor temperature alarm.² **(R 336.1225, R 336.1702(a), R 336.1910)**
- 7. The permittee shall not operate the process steps exhausted to the water scrubber (ID 631-501) unless the scrubber is installed, maintained, and operated in a satisfactory manner.² **(R 336.1225, R 336.1702(a), R 336.1910)**
- 8. The permittee shall equip and maintain the water scrubber (ID 631-501) with a water flow rate indicator.² **R 336.1225, R 336.1702(a), R 336.1910)**
- 9. The permittee shall not transfer melamine to a storage silo or to a charge hopper unless the associated emission control device identified in the table below is installed, maintained, and operated in a satisfactory manner:² **R 336.1224, R 336.1225, R 336.1331, R 336.1910)**

Process Equipment	Emission Control Device Associated with the Process Equipment
Melamine storage silo (ID 110-021A)	Bin vent filter (ID 110-021.3A)
Melamine storage silo (ID 110-021B)	Bin vent filter (ID 110-021.3B)
Melamine charge hopper (ID 120-006A)	Baghouse (ID 120-006A.IN)
Melamine charge hopper (ID 120-006B)	Baghouse (ID 120-006B.IN)

V. TESTING/SAMPLING

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

- 1. When testing is required or requested by the AQD District Supervisor, the permittee shall verify VOC, PM, methanol, formaldehyde, and melamine emission rates from FGMRPT by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in:² **(R 336.2001, R 336.2003, R 336.2004)**

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
VOC	40 CFR Part 60, Appendix A or 40 CFR Part 63, Appendix A
HAPs	40 CFR Part 63, Appendix A

- 2. At least once every five years, the permittee shall verify VOC emission rates from FGMRPT equipment exhausted through cryogenic condenser 631-516 using fresh methanol in the methanol scrubber (ID 631-509) when the outlet vapor temperature is less than -30°C. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**

3. At least once every five years, the permittee shall verify VOC emission rates from FGMRPT equipment exhausted through cryogenic condenser 631-516 using recycled methanol in the methanol scrubber (ID 631-509) when the outlet vapor temperature is more than -50°C but less than or equal to -30°C . An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**
4. At least once every five years, the permittee shall verify VOC emission rates from FGMRPT equipment exhausted through water scrubber 631-501. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**
5. At least once every five years, the permittee shall verify the methanol and formaldehyde emission rates from FGMRPT. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1225, R 336.2001, R 336.2003, R 336.2004)**
6. Upon request from the AQD District Supervisor, the permittee may be required to verify the PM and melamine emission rates from FGMRPT. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1224, R 336.1225, R 336.1331, R 336.2001, R 336.2003, R 336.2004)**
7. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall 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.² **(R 336.1205, R 336.1225, R 336.1702(a))**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the outlet vapor temperature from the final condensing step of the cryogenic condenser on a continuous basis. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The temperature monitoring device shall be calibrated once per calendar year.² **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 64.6(c)(1)(i, ii, and iii))**
3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the water flow rate of the water scrubber (ID 631-501) on a continuous basis. Water flow rate data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The water flow rate monitoring device shall be calibrated once per calendar year.² **(R 336.1225, R 336.1702(a), R 336.1910)**

4. The permittee shall keep, in a satisfactory manner, a baseline emission calculation for each product made in FGMRPT. Each baseline emission calculation shall show expected VOC emissions per pound of product. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**
5. The permittee shall calculate and record the total VOC emission rate from the following equipment in FGMRPT on a monthly basis, for each calendar month determining the cumulative emission rate during the first 12 months and the annual emission rate thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month. These emission calculations shall be derived from the records that are required in SC V.1, VI.2, VI.6, and VI.7. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**
 - a. FGMRPT equipment exhausted through cryogenic condenser 631-516.
 - b. FGMRPT equipment exhausted through water scrubber 631-501.
6. The permittee shall keep records of the amount, in pounds, of methylated resins produced in FGMRPT for each calendar month and 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**
7. The permittee shall keep, in a satisfactory manner, records of the water scrubber (ID 631-501) monitored water flow rate and records of the daily average flow rate. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1910)**
8. For each calendar day when fresh methanol is used in the methanol scrubber (ID 631-509), the permittee shall keep, in a satisfactory manner, a record of the daily average cryogenic condenser (ID 631-516) outlet vapor temperature. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1910)**
9. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the following:
 - a. The hours of operation of FGMRPT
 - b. The hours of operation of FGMRPT while the cryogenic condenser (ID 631-516) outlet vapor temperature is more than -50°C but less than or equal to -30°C and recycled methanol is used in the methanol scrubber (ID 531-509).

The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1910)**
10. During all periods when recycled methanol is used in the methanol scrubber (ID 631-509), the permittee shall keep, in a satisfactory manner, a record of the hourly average cryogenic condenser (ID 631-516) outlet vapor temperature. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1910)**
11. The permittee shall keep, in a satisfactory manner, records for each day indicating if recycle methanol was used in the methanol scrubber for that day. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**
12. An excursion for the outlet vapor temperature after the final condensing step of the cryogenic condenser (ID 631-516) shall be identified as one of the following:
 - a. When using fresh methanol in the scrubber, higher than -30°C;
 - b. When using recycled methanol in the scrubber, higher than -50°C, except for 2,351 hours per year, based on a 12-month rolling time period as determined at the end of each calendar month, during which the outlet vapor temperature may be greater than -50°C but shall not exceed -30°C.

When fresh methanol is used in the methanol scrubber, the condenser outlet vapor temperature may be determined using a calendar day average. When recycled methanol is used in the methanol scrubber, the condenser outlet vapor temperature shall be determined on an hourly basis. Excursions trigger an inspection,

corrective action and reporting in a semiannual report. Records of specific corrective action shall be kept onsite. **(40CFR 64.6(c)(2))**

13. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR Part 64.7(d))**
14. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR Part 64.6(c)(3), Part 64.7(c))**
15. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR Part 64.7(b))**
16. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR Part 64.9(b)(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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. 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 Part 64.9(a)(2)(i))**
6. 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 Part 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVMR631509	4 ²	45 ²	R 336.1225, 40 CFR 52.21(c) and (d)
2. SVMR631501	18 ²	45 ²	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

FGMACT DDDDD FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for existing Gas 1 (natural gas only). Boilers at major sources of HAPs per 40 CFR Part 63, Subpart DDDDD.

Emission Units: EUBOILER1, EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall only burn natural gas. ² (40 CFR Part 63.7499(I))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the initial and subsequent tune-ups and one-time energy assessment work practice standards for each applicable boiler at the source. ² (40 CFR Part 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4, 40 CFR 63.7510(e))
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. ² (40 CFR Part 63.7500(a)(3))
3. The permittee may obtain approval from the USEPA Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. ² (40 CFR Part 63.7500(b))
4. The permittee must:
 - a. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. ² (40 CFR Part 63.7540(a)(10), 40 CFR Part 63.7515(d))
 - b. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. ² (40 CFR Part 63.7540(a)(13))
 - c. Follow the procedures described in SC IX 4.a through 4.f for all initial and subsequent tune ups. ² (40 CFR Part 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)

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).² **(40 CFR Part 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.² **(40 CFR Part 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 shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The permittee must submit a Notification of Compliance Status that includes each boiler before the close of business on the 60th day following the completion of the initial compliance demonstrations for all boiler at the facility. The Notification of Compliance Status report must contain the following information:² **(40 CFR Part 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 Part 63.7545(e)(1))**
 - b. Certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR Part 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 Part 63.7545(e)(8)(i))**
 - ii. "This facility has had an energy assessment performed according to 40 CFR 63.7530(e)." **(40 CFR Part 63.7545(e)(8)(ii))**
6. Unless the USEPA 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.5, 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:² **(40 CFR Part 63.7550(b))**
 - a. The first semi-annual compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.1, and ending on June 30 or December 31, whichever date is the first date that occurs at least 180 days after the compliance date that is specified for the source in 40 CFR 63.7495, stated in SC IX.1. When submitting an annual, biennial, or 5-

- year compliance report, the first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495 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. ² **(40 CFR Part 63.7550(b)(1))**
- b. July 31 or January 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.1. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than January 31. ² **(40 CFR Part 63.7550(b)(2), 40 CFR Part 63.7550(b)(5))**
 - c. Each subsequent semi-annual 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. ² **(40 CFR Part 63.7550(b)(3))**
 - d. Each subsequent semi-annual 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. ² **(40 CFR Part 63.7550(b)(4), 40 CFR Part 63.7550(b)(5))**
7. The permittee must include the following information in the compliance report: ² **(40 CFR Part 63.7550(c), 40 CFR Part 63.7550(c)(1))**
- a. Company and Facility name and address. ² **(40 CFR Part 63.7550(c)(5)(i))**
 - b. Process unit information, emissions limitations, and operating parameter limitations. ² **(40 CFR Part 63.7550(c)(5)(ii))**
 - c. Date of report and beginning and ending dates of the reporting period. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 63.7550(c)(5)(xvii))**
8. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below: ² **(40 CFR Part 63.7550(h))**
- a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63 Subpart DDDDD electronically to the USEPA 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. ² **(40 CFR Part 63.7550(h)(3))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee must comply with 40 CFR Part 63 Subpart DDDDD no later than 3 years after the source becomes a major source. ² **(40 CFR Part 63.7495(c)(2))**
- 2. The permittee must be in compliance with the applicable work practice standards. ² **(40 CFR Part 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. ² **(40 CFR Part 63.7515(g))**

4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following:² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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 applicable boiler. ² **(40 CFR Part 63.7540(a)(10)(vi)(A))**
 - ii. A description of any corrective actions taken as a part of the tune-up. ² **(40 CFR Part 63.7540(a)(10)(vi)(B))**

Footnotes:

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

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

FGMACT OOO FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Equipment subject to 40 CFR Part 63, Subpart OOO.

Emission Units: EURECFORMTK, EUMFORMCELTK, EUFRMEOHTK, EURECMEOHTK, EURXN

POLLUTION CONTROL EQUIPMENT

Cryogenic condenser (ID 631-516), and water scrubber (ID 631-501)

I. EMISSION LIMIT(S)

1. The permittee shall reduce organic HAP emissions from the combined storage vessels and aggregate batch vent streams in FGMACT_OOO by 95 weight-percent. ² **(40 CFR Part 63.1404(a)(1), 40 CFR Part 63.1408(a)(1)(ii))**
2. The permittee shall reduce the organic HAP emissions from the collection of non-reactor batch process vents in FGMACT_OOO by 62 weight percent with the water scrubber. ² **(40 CFR Part 63.1407(a)(3)(ii))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Except during a pressure release event, operate each pressure relief device in organic HAP gas or vapor service with an instrument reading of less than 500 ppm above background as described in Method 21 of 40 CFR Part 60 Appendix A. ² **(40 CFR Part 63.1411(a))**
2. The permittee shall operate each control device such that the daily average of monitored parameters, established as specified in this 40 CFR 63.1413(a)(4) remains above the minimum level or below the maximum level, as appropriate. ² **(40 CFR Part 63.1413(a)(4))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Except as allowed under 40 CFR 63.1403(b), the permittee shall comply with the provisions of 40 CFR 63.1404 through 40 CFR 63.1410, as appropriate. When emissions are vented to a control device or control technology as part of complying with this 40 CFR Part 63 Subpart OOO, emissions shall be vented through a closed vent system meeting the requirements of 40 CFR Part 63 Subpart SS (National Emission Standards for closed vent systems, control devices, recovery devices). ² **(40 CFR Part 63.1403(a))**
2. The water scrubber (ID 631-501) shall reduce organic HAP emissions by 62 weight percent for the collection of non-reactor batch process vents it controls. ² **(40 CFR Part 63.1407(a)(3)(ii))**
3. The cryogenic condenser (ID 631-516) shall reduce organic HAP emissions by 95 percent measured by weight. This condition subsumes the control efficiency requirements for aggregate batch vent streams and storage vessels in 40 CFR 63.1408(a)(2)(ii). ² **(40 CFR Part 63.1404(a)(1), 40 CFR Part 63.1405(a)(2))**
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a water flow measurement device equipped with a continuous recorder located at the scrubber (ID 631-501) influent. ² **(40 CFR Part 63.1415(a), 40 CFR Part 63.1415(b)(1)(ii), 40 CFR Part 63.1417(k))**

5. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the outlet vapor temperature from the final condensing step of the cryogenic condenser on a continuous basis.² **(40 CFR Part 63.1415(a), 40 CFR Part 63.1415(b)(3))**
6. The permittee equip each pressure relief device in organic HAP service with a device(s) or parameter monitoring system that is capable of:² **(40 CFR Part 63.1411(c))**
 - a. Identifying the pressure release;
 - b. Recording the time and duration of each pressure release; and
 - c. Notifying operators immediately that a pressure release is occurring. The device or monitoring system may be either specific to the pressure relief device itself or may be associated with the process system or piping sufficient to indicate a pressure release to the atmosphere. Examples of these types of devices and systems include, but are not limited to, a rupture disk indicator, magnetic sensor, motion detector on the pressure relief valve stem, flow monitor, or pressure monitor.

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 verify HAPs emission rates, required by 40 CFR 63.1413(a)(2), from FGMACT OOO by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR 63.1414(a). An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
2. The permittee shall verify the HAPs emission rates from FGMACT OOO, at a minimum, every five years from the date of the last test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. *Data retention.* Unless otherwise specified in this 40 CFR Part 63 Subpart OOO, the permittee shall keep copies of all applicable records and reports required by 40 CFR Part 63 Subpart OOO for at least 5 years, as specified in 40 CFR 63.1416(a)(1), with the exception listed in 40 CFR 63.1416(a)(2):² **(40 CFR Part 63.1416(a))**
 - a. All applicable records shall be maintained in such a manner that they can be readily accessed. The most recent 6 months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request. The remaining 4 and one half years of records may be retained offsite. Records may be maintained in hard copy or computer readable form including, but not limited to, on paper, microfilm, computer, floppy disk, CD-ROM, optical disc, magnetic tape, or microfiche.
 - b. If the permittee submits copies of reports to the appropriate USEPA Regional Office, the permittee is not required to maintain copies of reports. If the USEPA Regional Office has waived the requirement of 40 CFR 63.10(a)(4)(ii) for submittal of copies of reports, the permittee is not required to maintain copies of those reports.
2. Unless one or more of the conditions specified in 40 CFR 63.1409(a)(1) through (6) are met, the permittee shall monitor each heat exchange system used to cool process equipment in an affected source, according to the provisions in either 40 CFR 63.1409(b) or (c).² **(40 CFR Part 63.1409)**

3. The permittee shall comply with the requirements of 40 CFR Part 63 Subpart UU for all equipment, as defined under 40 CFR 63.1402, that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more, except 40 CFR 63.1030. The weight-percent HAP is determined for equipment using the organic HAP concentration measurement methods specified in 40 CFR 63.1414(a).² **(40 CFR Part 63.1410)**
4. The permittee shall keep malfunction records as specified in 40 CFR 63.1416(b)(1) through (3).² **(40 CFR Part 63.1416)**
5. *Monitoring records.* If the permittee is required to comply with 40 CFR 63.1415 and, therefore, required to keep continuous records, the permittee shall keep records as specified in 40 CFR 63.1416(c)(1) through (6).² **(40 CFR Part 63.1416(c))**
6. *Aggregate batch vent stream records.* The permittee shall comply with the recordkeeping requirements for continuous process vents specified in 40 CFR Part 63 Subpart SS.² **(40 CFR Part 63.1416(e))**
7. *Controlled batch process vent continuous compliance records.* The permittee shall keep continuous compliance records for batch process vent as specified in 40 CFR 63.1416(d)(3).² **(40 CFR Part 63.1416(d))**
8. *Establishment of parameter monitoring level records.* For each parameter monitored according to 40 CFR 63.1415(b) and Table 3 of 40 CFR Part 63 Subpart OOO, the permittee shall maintain documentation showing the establishment of the level that indicates proper operation of the control device or control technology, including the following:² **(40 CFR Part 63.1416(d)(2))**
 - a. Parameter monitoring data used to establish the level.
 - b. Identification that the parameter monitoring level is associated with a batch cycle daily average.
 - c. A definition of the batch cycle.
9. *Other records or documentation.* For continuous monitoring systems used to comply with 40 CFR Part 63 Subpart OOO, the permittee shall keep records documenting the completion of calibration checks and records documenting the maintenance of continuous monitoring systems that are specified in the manufacturer's instructions or that are specified in other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.² **(40 CFR Part 63.1416(g))**
10. The permittee shall retain the following records for heat exchange systems:² **(40 CFR Part 63.1416(g)(4))**
 - a. Monitoring data required by 40 CFR 63.1409 indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination.
 - b. Records of any leaks detected by procedures subject to 40 CFR 63.1409(c)(2) and the date the leak was detected.
 - c. The dates of efforts to repair leaks.
 - d. The method or procedure used to confirm repair of a leak and the date repair was confirmed.
11. If any pressure relief device in organic HAP service releases to atmosphere as a result of a pressure release event, the permittee shall calculate the quantity of organic HAP released during each pressure release event and report this quantity as required in 40 CFR 63.1417(f)(13)(iii). Calculations may be based on data from the pressure relief device monitoring alone or in combination with process parameter monitoring data and process knowledge.² **(40 CFR Part 63.1411(c)(2))**
12. For pressure relief devices in organic HAP service, the permittee shall keep records of the information specified in 40 CFR 63.1416(g)(5)(i) through (v), as applicable:² **(40 CFR Part 63.1416(g)(5))**
 - a. A list of identification numbers for pressure relief devices that vent to a fuel gas system, process, drain system, or closed-vent system and control device, under the provisions in 40 CFR 63.1411(d).
 - b. A list of identification numbers for pressure relief devices subject to the provisions in 40 CFR 63.1411(a).
 - c. A list of identification numbers for pressure relief devices equipped with rupture disks, under the provisions in 40 CFR 63.1411(b)(2).
 - d. The dates and results of the monitoring following a pressure release for each pressure relief device subject to the provisions in 40 CFR 63.1411(a) and (b). The results shall include:
 - i. The background level measured during each compliance test.
 - ii. The maximum instrument reading measured at each piece of equipment during each compliance test.

- e. For pressure relief devices in organic HAP service subject to 40 CFR 63.1411(c), keep records of each pressure release to the atmosphere, including the following information:
 - i. The source, nature, and cause of the pressure release.
 - ii. The date, time, and duration of the pressure release.
 - iii. An estimate of the quantity of total HAP emitted during the pressure release and the calculations used for determining this quantity.
 - iv. The actions taken to prevent this pressure release.
 - v. The measures adopted to prevent future such pressure.

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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The permittee shall submit all reports required by 40 CFR 63.1417(a).² **(40 CFR Part 63.1417(a))**
6. *Submittals.* The permittee shall submit all reports required under 40 CFR Part 63 Subpart OOO to the Administrator at the appropriate address listed in 40 CFR 63.13. If acceptable to both the Administrator and the permittee, reports may be submitted on electronic media.² **(40 CFR Part 63.1417(c))**
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), as described in Table 5 to 40 CFR Part 63 Subpart OOO.² **(40 CFR Part 63.1417)**
8. The permittee shall submit a Notification of Compliance Status pursuant to 40 CFR 63.1417(e).² **(40 CFR Part 63.1717(e))**
9. The permittee shall submit all Periodic Reports pursuant to 40 CFR 63.1417(f).² **(40 CFR Part 63.1717(f))**
10. If the permittee fails to meet an applicable standard, the permittee shall report such events in the Semi-Annual Report and shall report the number of failures to meet an applicable standard. For each instance, the permittee shall report the date, time and duration of each failure. For each failure the report must include a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.² **(40 CFR Part 63.1417(g))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63 Subpart A and Subpart OOO National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins. (40 CFR Part 63 Subparts A and OOO), as specified in USEPA Administrative Consent Order EPS-5-17-113(a)-MI-03. A startup, shutdown, and malfunction plan (SSMP) typically required by 40 CFR 63.6(e)(3) is not required for 40 CFR Part 63 Subpart OOO. ² **(40 CFR Part 63, Subpart OOO)**

Footnotes:

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

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

FGMACT ZZZZ FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Existing emergency generator exempt from Permit to Install requirements pursuant to Rule 285(g) and subject to 40 CFR 63, Subpart ZZZZ.

Emission Units: EU-CUMMINS_ENG and EU-DET_DIESEL_ENG

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain any affected RICE, 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 Part 63.6605(b))**
2. To be considered an emergency stationary RICE under Subpart ZZZZ, the permittee shall limit operation of FGMACT_ZZZZ as follows:
 - a. There is no time limit on the use of FGMACT_ZZZZ in emergency situations **(40 CFR Part 63.6640(f)(1))**. The permittee may operate FGMACT_ZZZZ for a maximum of 100 hours per year for 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 owner or operator 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 calendar year. **(40 CFR Part 63.6640(f)(2)(i))**
 - b. The permittee may operate FGMACT_ZZZZ up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to supply power to an electric grid. **(40 CFR Part 63.6640(f)(3))**
3. The permittee must conduct the following:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first.
 - b. Inspect air cleaner (compression ignition units) or spark plugs (spark ignition units) every 1,000 hours of operation or annually whichever comes first, and replace as necessary.
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. **(40 CFR Part 63.6602, Table 2c to Subpart ZZZZ of Part 63)**

4. The permittee must operate and maintain the stationary RICE and after treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR Part 63.6625(e), 40 CFR Part 63.6640(a), Table 6)**
5. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time 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) in Table 2c to Subpart ZZZZ of Part 63 apply. **(40 CFR Part 63.6625(h))**
6. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6602 as listed in SC III.4. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i) for CI engines or 40 CFR 63.6625(j) for SI engines. **(40 CFR Part 63.6625(i) and (j))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each existing emergency stationary RICE with a non-resettable hour meter. **(40 CFR Part 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 for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content. **(40 CFR Part 63.6625(i))**
2. If using the oil analysis program for SI Engine(s), the permittee shall test for Total Acid Number, viscosity and percent water content. **(40 CFR Part 63.6625(j))**

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 the hours of operation of FGMACT_ZZZZ. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1201(3))**
2. The permittee shall maintain a log of the hours of operation, including reason (i.e.: emergency, maintenance testing, readiness testing). **(40 CFR Part 63.6640)**
3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine and after-treatment device (if any) was operated and maintained according to the maintenance plan. **(40 CFR Part 63.6655(e))**
4. The permittee must keep records of the occurrence and duration of each malfunction of operation of the engine, or air pollution control and monitoring equipment, if installed. **(40 CFR Part 63.6655(a)(2))**
5. The permittee shall keep in a satisfactory manner, 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, if installed, to its normal or usual manner of operation. **(40 CFR Part 63.6655(a)(5))**

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 any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants from Stationary Reciprocating Internal Combustion Engines. **(R336.1213(3), 40 CFR Part 63, Subpart ZZZZ)**

Footnotes:

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

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

FGCOLDCLEANERS 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: EUCOLDCLEANERS

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

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain 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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE290 **FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: EUMF III BLEND, EUMF 3000 BLEND, EUMF 6000 BLEND, EUMF III PACK, EUMF 3000 PACK, EUMF 6000 PACK

Emission Units installed prior to December 20, 2016: NA

POLLUTION CONTROL EQUIPMENT

Fabric filter serving EUMF_III_PACK, EUMF_3000_PACK, EUMF_6000_PACK

I. EMISSION LIMIT(S)

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

- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. (R 336.1290(2)(a)(iii)(B))
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(2)(a)(iii)(C))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)
- 2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:
 - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: (R 336.1290(2)(b)(i), R 336.1910)
 - 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 permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. (R 336.1290(2)(b)(ii), R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

- e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in enough detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. (R 336.1213(3), R 336.1290(2)(d))
 - f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. (R 336.1213(3), R 336.1290(2)(e))
2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. (R 336.1213(3))
- a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(2)(c), R 336.1213(3))
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (R 336.1213(3))
3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. (R 336.1213(3))

See Appendix 4

If the permittee chooses to use record form EQP3558 for its Rule 290 emission unit(s), the permittee has the option of placing the form in Appendix 4 of the ROP. The latest version of the form is available on the EGLE, AQD website. The permittee is not required to include record form EQP3558 in their ROP.

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

ROP No: MI-ROP-B1677-2018a
Expiration Date: December 6, 2023
PTI No: MI-PTI-B1677-2018a

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTI and/or Operate that relates to the identified emission units or flexible groups as of the effective date of this ROP. This includes all PTI and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-B1677-2016. The PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
418-96H	Entire Facility, except for the two emergency generators.	FGBOILERS FGMACT_DDDDD FGMACT_OOO FGMRPT EUMACT_EEEE

The following table lists the ROP amendments or modifications issued after the effective date of ROP No. MI-ROP-B1677-2018.

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
418-96I	201900072 / August 6, 2019	Incorporate PTI 418-96I which was to add requirements to the PTI based on a USEPA consent agreement and final order (CAFO). The company also identified four emission units in FGZYREZ (EUCYREZSTTK, EUCYREZHDTK EUCYREZBLND, and EUCYREZPKG). And added requirements to use the newly-installed water scrubber when operating	EUCYREZSTTK EUCYREZHDTK EUCYREZBLND EUCYREZPKG FGZYREZ FGMRPT

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
		<p>FGCYREZ. (The CAFO required 90% removal of organic HAP.)</p> <p>Along with the CAFO-related requirements, the company removed the requirements to read visible emissions from FGCYEZ equipment.</p> <p>Additional changes to the facility's permit included:</p> <ul style="list-style-type: none"> • FGCYREZ: include Group 1 requirements under the National Emission Standards for NESHAP in 40 CFR Part 63, Subpart FFFF [the Miscellaneous Organic NESHAP (MON)]. This would involve replacing the 10,000 pounds per year emission limit for uncontrolled organic HAP with a 98% removal requirement for organic HAP, verified by the results of the stack test required by the CAFO. And change the condition related to the MON, related to the change from Group 2 to Group 1 • FGMRPT: Based on recent stack test data, the PTI removed the restriction on hours of operation using fresh methanol in the methanol scrubber. <p>PTI 418-961 application was not required to go through the public participation process.</p>	

Appendix 7. Emission Calculations

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

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

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

EFFECTIVE DATE: December 6, 2018

REVISION DATE: August 6, 2019

ISSUED TO

Allnex USA, Inc.

State Registration Number (SRN): B1677

LOCATED AT

2715 Miller Road, Kalamazoo, Michigan 49001

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B1677-2018a

Expiration Date: December 6, 2023

Administratively Complete ROP Renewal Application
Due Between June 6, 2022, and June 6, 2023

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to 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-B1677-2018a

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

Rex Lane, Kalamazoo District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Administrative Order USEPA-5-17-113(a)-MI-03 entered on January 25, 2017, between the USEPA and the permittee.

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

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

Emission Limits

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

The grading of visible emissions shall be determined in accordance with Rule 303.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

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

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate: **(R 336.1213(3)(b))**
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which 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 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP: **(R 336.1213(3)(c))**
- a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.
22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
- a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete." The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

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

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

27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not

expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

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

Reopenings

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

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

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

used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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

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
EUBOILER1	Boiler No. 1 (29 MMBTU/hr heat input)	01-15-1971	FGBOILERS FGMACT DDDDD
EUBOILER3	Boiler No. 3 (72 MMBTU/hr heat input)	02-01-1986	FGBOILERS FGMACT DDDDD
EUMFORMCELTK	41,400 gallon methyl formcel storage tank.	08-01-1975	FGMRPT FGMACT_OOO
EUMRECFORMTK	41,400 gallon recycled formaldehyde storage tank.	08-01-1975	FGMRPT FGMACT_OOO
EUNITRICTK	17,400 gallon 67% nitric acid storage tank.	08-01-1975	FGMRPT
EUMELSTOR	Melamine storage and handling, including the melamine unloading blower, the north and south melamine silos, the melamine transfer blower, and the melamine air filters.	08-01-1975	FGMRPT
EUFRMEOHTK	50,000 gallon fresh methanol storage tank.	08-01-1975	FGMRPT FGMACT_OOO
EURECMEOHTK	30,000 gallon recycled methanol storage tank.	08-01-1975	FGMRPT FGMACT_OOO
EURXN	Equipment used in the chemical reaction to form the methylated resin product, including reactors, condensers, tanks, distillation systems, and solids separation equipment, and product recovery equipment. Emissions are controlled by a vapor balance system, methanol scrubber, cryogenic condenser, and a water scrubber.	08-01-1975	FGMRPT FGMACT_OOO
EUCYMELTKA	50,000 gallon Cymel 303 storage tank A	08-01-1975	FGMRPT
EUCYMELTKB	50,000 gallon Cymel 303 storage tank B	08-01-1975	FGMRPT
EUCYREZSTTK	5,000 gallon Cyrez intermediate storage tank. Emissions are controlled by a packed bed water scrubber.	11-12-1986	FGCYREZ
EUCYREZHDTK	350 gallon Cyrez head tank. Emissions are controlled by a packed bed water scrubber.	11-12-1986	FGCYREZ

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCYREZBLND	Ribbon blender for Cyrez product. Emissions controlled by a baghouse that vents to a packed bed water scrubber.	11-12-1986	FGCYREZ
EUCYREZPKG	Surge bins for packaging Cyrez product. Emissions controlled by a baghouse that vents to a packed bed water scrubber.	11-12-1986	FGCYREZ
EUMACT_EEEE	Transfer racks subject to 40 CFR Part 63, Subpart EEEE. Storage tanks are not subject to this subpart, as they are covered under Subpart OOO.	08-01-1975	NA
EUCUMMINS_ENG	335 HP emergency generator	01-01-1977 and 01-01-2002	FGMACT ZZZZ
EUDET_DIESEL_ENG	288 HP emergency generator	01-01-1997	FGMACT ZZZZ
EUCOLDCLEANERS	All cold cleaners at the Facility.	03-24-2014	FGCOLDCLEANERS
EUMF_III_BLEND	Modaflow III resin powder production blending	05-01-2019	FGRULE290
EUMF_3000_BLEND	Modaflow 3000 resin powder production blending	05-01-2019	FGRULE290
EUMF_6000_BLEND	Modaflow 6000 resin powder production blending	05-01-2019	FGRULE290
EUMF_III_PACK	Modaflow III resin powder production packaging	05-01-2019	FGRULE290
EUMF_3000_PACK	Modaflow 3000 resin powder production packaging	05-01-2019	FGRULE290
EUMF_6000_PACK	Modaflow 3000 resin powder production packaging	05-01-2019	FGRULE290
Changes to the equipment described in this Table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

EUMACT_EEEE EMISSION UNIT CONDITIONS

DESCRIPTION

Transfer racks subject to 40 CFR Part 63, Subpart EEEE. Storage tanks are not subject to this subpart, as they are covered under Subpart OOO.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

The permittee shall limit the total actual annual facility-level organic liquid loading volume through transfer racks, excluding maintenance activities, where the total 40 CFR Part 63 Subpart EEEE Table 1 organic HAP content of the organic liquid being loaded through one or more of the transfer rack's arms is at least 98 percent by weight and the material is being loaded into a transport vehicle, to 800,000 gallons.² **(40 CFR Part 63.2346(b), 40 CFR Part 63, Subpart EEEE, Table 2).**

The permittee shall limit the total actual annual facility-level organic liquid containing at least 5 percent organic HAP loading volume through transfer racks, excluding maintenance activities, to less than 10,000,000 gallons.² **(40 CFR Part 63.2346(b), 40 CFR Part 63, Subpart EEEE, Table 2).**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each emission source identified in 40 CFR 63.2338 that does not require control under this subpart, the permittee shall keep all records identified in 40 CFR 63.2343.² **(40 CFR Part 63.2390(a))**
2. For each transfer rack that meets the conditions identified in 40 CFR 63.2343(c), the permittee shall keep documentation, including the records specified in 40 CFR 63.2390(d), that verifies the transfer rack is not required to be controlled under this subpart. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form in a separate location.² **(40 CFR Part 63.2343(c)(3))**

3. The permittee shall keep records of the total actual annual facility-level organic liquid loading volume as defined in 40 CFR 63.2406 through transfer racks to document the applicability, or lack thereof, of the emission limitations in 40 CFR Part 63 Subpart EEEE table 2, items 7 through 10.² **(40 CFR Part 63.2390(d))**
4. The permittee shall keep all records in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form at a separate location.² **(40 CFR Part 63.2394(a))**
5. As specified in 40 CFR 63.10(b)(1), the permittee shall keep all files of all information (including all reports and notifications) for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.² **(40 CFR Part 63.2394(b))**
6. The permittee shall keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee may keep the records off site for the remaining 3 years.² **(40 CFR Part 63.2394(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 shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. For each transfer rack subject to this subpart that loads organic liquids but is not subject to control based on the criteria specified in 40 CFR Part 63 Subpart EEEE Table 2, items 7 through 10, the permittee shall submit the information in 40 CFR 63.2386(c)(1), (2), (3), and (10)(i) in either the Notification of Compliance Status, according to the schedule specified in 40 CFR Part 63 Subpart EEEE Table 12, or a first Compliance report, according to the schedule specified in 40 CFR 63.2386(b), whichever occurs first. **(40 CFR Part 63.2343(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and EEEE, as they apply to transfer racks at the facility, as specified in USEPA Administrative Consent Order EPS-5-17-113(a)-MI-03. In addition to the provisions specified in EUMACT_EEEE, these provisions include: **(40 CFR Part 63, Subparts A and EEEE)**
 - a. Records as required by 40 CFR 63.2390
 - b. A startup, shutdown, and malfunction plan (SSMP) is required by 40 CFR 63.6(e)(3); however, as specified in 40 CFR Part 63 Subpart EEEE Table 12, the 2-day reporting requirement in 40 CFR 63.6(e)(3)(iv) does not apply and 40 CFR 63.6(e)(3) does not apply to emissions sources not requiring control, such as EUMACT_EEEE.

Footnotes:

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

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBOILERS	Natural gas fired boilers.	EUBOILER1 EUBOILER3
FGCYREZ	Batch process: Cyrez production.	EUCYREZSTTK EUCYREZHDTK EUCYREZBLND EUCYREZPKG
FGMRPT	Batch process: Cymel production methylated resins.	EURECFORMTK EUMFORMCELTK EUNITRICTK EUMELSTOR EUFRMEOHTK EURECMEOHTH EURXN EUCYMELTKA EUCYMELTKB
FGMACT DDDDD	Requirements for existing Gas 1 (natural gas only). Boilers at major sources of HAPs per 40 CFR Part 63, Subpart DDDDD.	EUBOILER1 EUBOILER3
FGMACT OOO	Equipment subject to 40 CFR Part 63, Subpart OOO.	EURECFORMTK EUMFORMCELTK EUFRMEOHTK EURECMEOHTK EURXN
FGMACT ZZZZ	Existing emergency generators exempt from Permit to Install requirements pursuant to Rule 285(2)(g) and subject to 40 CFR 63, Subpart ZZZZ.	EUCUMMINS_ENG EUDET_DIESEL_ENG
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h), or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANERS

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	

**FGBOILERS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Natural gas fired boilers.

Emission Units: EUBOILER1 and EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx ^A	0.18 pound per MMBTU heat input ²	Hourly	Each boiler in FGBOILERS	SC V.1 and V.2	R336.1205(3), 40 CFR 52.21(c) and (d)

^A "Nirtogen oxides" means all oxides of nitrogen, determined as nitrogen dioxide.

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in FGBOILERS.² **(R 336.1205, R 336.2802, 40 CFR Part 52.21)**

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. Upon request from the AQD District Supervisor, the permittee may be required to verify the NOx emission rate from either boiler in FGBOILERS testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60 Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1205, R 336.2001, R 336.2003, R 336.2004, 40 CFR Part 52.21 (c) and (d))**
2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

NA

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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVB001	24 ²	50 ²	40 CFR 52.21 (c) and (d)
2. SVB003	48 ²	50 ²	40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

**FGCYREZ
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Batch process: Cyrez production.

Emission Unit: EUCYREZSTTK, EUCYREZHDTK, EUCYREZBLND, EUCYREZPKG

POLLUTION CONTROL EQUIPMENT

Baghouse (631-003) controls emissions from EUCYREZBLND and EUCYREZPKG; water scrubber (631-006) controls emissions from EUCYREZSTTK, EUCYREZHDTK, and the baghouse (631-003).

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.05 pound per 1,000 pounds of exhaust gases on a dry gas basis ²	Hourly	FGCYREZ	SC V.1 and V.2	R336.1331
2. PM	1 pph ²	Hourly	FGCYREZ	SC V.1 and V.2	R 336.1331
3. Organic HAP	98% removal ²	Hourly	FGCYREZ	SC VI.2 and VI.3	43 CFR 63.2460, Table 2 of 40 CFR Part 63 Subpart FFFF
4. VOC	18.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGCYREZ	SC VI.4	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate EUCYREZBLND or EUCYREZPKG unless the baghouse (ID 631-003) is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the baghouse pressure drop in the range specified by the manufacturer.² **(R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall equip and maintain baghouse 631-003 with a pressure drop indicator.² **(R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall not operate any equipment in FGCYREZ unless the water scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the water scrubber includes maintaining the water flow rate at or above the rate established during performance testing.² **(R 336.1702(a), R 336.1910)**

4. The permittee shall equip and maintain the water scrubber with a water flow rate indicator.² **(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. Upon request from the AQD District Supervisor, the permittee may be required to verify the PM emission rates from FGCYREZ testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60 Appendix A or Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1331, R 336.2001, R 336.2003, R 336.2004)**
2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record, in a satisfactory manner, the baghouse 631-003 pressure drop on a daily basis.² **(R 336.1301, R 336.1331, R 336.1910)**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the water flow rate of the water scrubber (631-006) on a continuous basis. Water flow rate data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The water flow rate monitoring device shall be calibrated once per calendar year.² **(R 336.1702(a), R 336.1910)**
3. The permittee shall keep, in a satisfactory manner, records of the water scrubber (631-006) monitored water flow rate, records of the daily average flow rate, and records of all periods when these flow rates are lower than the rate established during performance testing. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1702(a), R 336.1910)**
4. The permittee shall calculate the VOC emission rate from FGCYREZ monthly, for the calendar month and for the 12-month rolling time period ending that calendar month, using a method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1702(a))**

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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCYR631003	22 ²	50 ²	R336.1225, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and FFFF as they apply to the facility. In addition to the provisions specified in FGYZREZ, these provisions include:² **(40 CFR Part 63, Subparts A and FFFF)**
 - a. A Leak Detection Monitoring and Repair (LDAR) Program is not required because all equipment contains HAP at <5 percent content.
 - b. Heat exchange systems monitoring is not required because all equipment contains HAP at <5 percent content.
 - c. By June 26, 2019, the permittee shall submit a proposed startup, shutdown, and malfunction plan to the AQD District Supervisor.
 - d. Notifications, reports and records as required by 40 CFR 63.2515, 40 CFR 63.2520 and 40 CFR 63.2525.

Footnotes:

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

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

**FGMRPT
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Batch process: Cymel production methylated resins.

Emission Units: EURECFORMTK, EUMFORMCELTK, EUNITRICTK, EUMELSTOR, EUFRMEOHTK, EURECMEOHTK, EURXN, EUCYMELTKA, EUCYMELTKB

POLLUTION CONTROL EQUIPMENT

Vapor balance system, methanol scrubber (ID 631-509), and cryogenic condenser (ID 631-516, SVMR631509), water scrubber (ID 631-501, SVMR631501), Bin vent filter (ID 110-021.3A), Bin vent filter (ID 110-021.3B), Baghouse (ID 120-006A.IN), and Baghouse (ID 120-006B.IN)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	49 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGMRPT equipment exhausted through cryogenic condenser 631-516	SC V.1, V.2, V.3, VI.2, VI.4, VI.5, VI.8, VI.9, VI.10, VI.11	R 336.1702(a)
2. VOC	6.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGMRPT equipment exhausted through water scrubber 631-501	SC V.1, V.4, VI.3, VI.5, VI.7	R 336.1702(a)
3. VOC	24.7 pph ²	Hourly	FGMRPT equipment exhausted through cryogenic condenser 631-516 and using recycled methanol in methanol scrubber 631-509 while the outlet vapor temperature is more than -50°C	SC V.1, V.3	R 336.1702(a)
4. VOC	6.1 pph ²	Hourly	FGMRPT equipment exhausted through cryogenic condenser 631-516 and using recycled methanol in methanol scrubber 631-509 while the outlet vapor temperature is -50°C or less	SC V.1, V.2	R 336.1702(a)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
5. VOC	6.1 pph ²	Hourly	FGMRPT equipment exhausted through cryogenic condenser 631-516 and using fresh methanol in methanol scrubber 631-509	SC V.1, V.2	R 336.1702(a)
6. Particulate Matter	0.076 pound per 1,000 pounds of exhaust gases on a dry gas basis ²	Hourly	FGMRPT	SC V.1, V.6	R 336.1224 R 336.1225 R 336.1331
7. Formaldehyde (HCHO)	1.3 pph ¹	Hourly	FGMRPT operations exhausted through the cryogenic condenser	SC V.1, V.5, VI.2	R 336.1225
8. HCHO	0.09 pph ¹	Hourly	FGMRPT operations exhausted through the water scrubber	SC V.1, V.5, VI.7	R 336.1225
9. Methanol (MeOH)	6.1 pph ¹	Hourly	FGMRPT operations exhausted through the cryogenic condenser	SC V.1, V.5 VI.2, VI.8, VI.9, VI.10, VI.11	R 336.1225
10. MeOH	8.0 pph ¹	Hourly	FGMRPT operations exhausted through the water scrubber	SC V.1, V.5, VI.7, VI.8, VI.9, VI.10, VI.11	R 336.1225
11. Melamine	0.54 pph ¹	Hourly	Melamine storage silos loading	SC V.1, V.6	R 336.1224 R 336.1225
12. Melamine	0.09 pph ¹	Hourly	Charge hoppers loading	SC V.1, V.6	R 336.1224 R 336.1225

II. MATERIAL LIMIT(S)

1. The permittee shall not process more than 76.6 million pounds of methylated resin product per year, based on a 12-month rolling time period.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the process steps that use nitrogen blankets unless the on-demand nitrogen blanketing system is installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1702(a), R 336.1910)
2. The permittee shall not operate the process steps that use vapor balance unless the vapor balance system is installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1702(a), R 336.1910)
3. The permittee shall not perform reflux operations in the first reactor (ID 120-051) unless the vent receiver tank and vacuum pump are installed, maintained, and operated in a satisfactory manner.² (R 336.1225, R 336.1702(a), R 336.1910)
4. The permittee shall not operate the process steps exhausted to the methanol scrubber (ID 631-509) unless the cryogenic condenser (ID 631-516) is installed, maintained, and operated in a satisfactory manner. Operation of the cryogenic condenser in a satisfactory manner includes achieving an outlet vapor temperature after the final condensing step as described below:

- a. When using fresh methanol in the scrubber, -30°C or lower
- b. When using recycled methanol in the scrubber, -50°C or lower, except for 2,351 hours per year, based on a 12-month rolling time period as determined at the end of each calendar month, during which the outlet vapor temperature may be greater than -50°C but shall not exceed -30°C.

When fresh methanol is used in the methanol scrubber, the condenser outlet vapor temperature may be determined using a calendar day average. When recycled methanol is used in the methanol scrubber, the condenser outlet vapor temperature shall be determined on an hourly basis.² **(R 336.1225, R 336.1702(a), R 336.1910)**

- 5. The permittee shall equip and maintain a thermocouple to monitor the outlet temperature of the cryogenic condenser. **(40 CFR 64.6(c)(1)(i and ii))**
- 6. The permittee shall equip and maintain the cryogenic condenser (ID 631-516) with a high outlet vapor temperature alarm.² **(R 336.1225, R 336.1702(a), R 336.1910)**
- 7. The permittee shall not operate the process steps exhausted to the water scrubber (ID 631-501) unless the scrubber is installed, maintained, and operated in a satisfactory manner.² **(R 336.1225, R 336.1702(a), R 336.1910)**
- 8. The permittee shall equip and maintain the water scrubber (ID 631-501) with a water flow rate indicator.² **R 336.1225, R 336.1702(a), R 336.1910)**
- 9. The permittee shall not transfer melamine to a storage silo or to a charge hopper unless the associated emission control device identified in the table below is installed, maintained, and operated in a satisfactory manner:² **R 336.1224, R 336.1225, R 336.1331, R 336.1910)**

Process Equipment	Emission Control Device Associated with the Process Equipment
Melamine storage silo (ID 110-021A)	Bin vent filter (ID 110-021.3A)
Melamine storage silo (ID 110-021B)	Bin vent filter (ID 110-021.3B)
Melamine charge hopper (ID 120-006A)	Baghouse (ID 120-006A.IN)
Melamine charge hopper (ID 120-006B)	Baghouse (ID 120-006B.IN)

V. TESTING/SAMPLING

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

- 1. When testing is required or requested by the AQD District Supervisor, the permittee shall verify VOC, PM, methanol, formaldehyde, and melamine emission rates from FGMRPT by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in:² **(R 336.2001, R 336.2003, R 336.2004)**

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
VOC	40 CFR Part 60, Appendix A or 40 CFR Part 63, Appendix A
HAPs	40 CFR Part 63, Appendix A

- 2. At least once every five years, the permittee shall verify VOC emission rates from FGMRPT equipment exhausted through cryogenic condenser 631-516 using fresh methanol in the methanol scrubber (ID 631-509) when the outlet vapor temperature is less than -30°C. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**

3. At least once every five years, the permittee shall verify VOC emission rates from FGMRPT equipment exhausted through cryogenic condenser 631-516 using recycled methanol in the methanol scrubber (ID 631-509) when the outlet vapor temperature is more than -50°C but less than or equal to -30°C. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**
4. At least once every five years, the permittee shall verify VOC emission rates from FGMRPT equipment exhausted through water scrubber 631-501. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**
5. At least once every five years, the permittee shall verify the methanol and formaldehyde emission rates from FGMRPT. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1225, R 336.2001, R 336.2003, R 336.2004)**
6. Upon request from the AQD District Supervisor, the permittee may be required to verify the PM and melamine emission rates from FGMRPT. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1224, R 336.1225, R 336.1331, R 336.2001, R 336.2003, R 336.2004)**
7. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall 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.² **(R 336.1205, R 336.1225, R 336.1702(a))**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the outlet vapor temperature from the final condensing step of the cryogenic condenser on a continuous basis. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The temperature monitoring device shall be calibrated once per calendar year.² **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 64.6(c)(1)(i, ii, and iii))**
3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the water flow rate of the water scrubber (ID 631-501) on a continuous basis. Water flow rate data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The water flow rate monitoring device shall be calibrated once per calendar year.² **(R 336.1225, R 336.1702(a), R 336.1910)**

4. The permittee shall keep, in a satisfactory manner, a baseline emission calculation for each product made in FGMRPT. Each baseline emission calculation shall show expected VOC emissions per pound of product. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**
5. The permittee shall calculate and record the total VOC emission rate from the following equipment in FGMRPT on a monthly basis, for each calendar month determining the cumulative emission rate during the first 12 months and the annual emission rate thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month. These emission calculations shall be derived from the records that are required in SC V.1, VI.2, VI.6, and VI.7. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**
 - a. FGMRPT equipment exhausted through cryogenic condenser 631-516.
 - b. FGMRPT equipment exhausted through water scrubber 631-501.
6. The permittee shall keep records of the amount, in pounds, of methylated resins produced in FGMRPT for each calendar month and 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**
7. The permittee shall keep, in a satisfactory manner, records of the water scrubber (ID 631-501) monitored water flow rate and records of the daily average flow rate. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1910)**
8. For each calendar day when fresh methanol is used in the methanol scrubber (ID 631-509), the permittee shall keep, in a satisfactory manner, a record of the daily average cryogenic condenser (ID 631-516) outlet vapor temperature. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1910)**
9. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the following:
 - a. The hours of operation of FGMRPT
 - b. The hours of operation of FGMRPT while the cryogenic condenser (ID 631-516) outlet vapor temperature is more than -50°C but less than or equal to -30°C and recycled methanol is used in the methanol scrubber (ID 531-509).

The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1910)**
10. During all periods when recycled methanol is used in the methanol scrubber (ID 631-509), the permittee shall keep, in a satisfactory manner, a record of the hourly average cryogenic condenser (ID 631-516) outlet vapor temperature. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1910)**
11. The permittee shall keep, in a satisfactory manner, records for each day indicating if recycle methanol was used in the methanol scrubber for that day. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**
12. An excursion for the outlet vapor temperature after the final condensing step of the cryogenic condenser (ID 631-516) shall be identified as one of the following:
 - a. When using fresh methanol in the scrubber, higher than -30°C;
 - b. When using recycled methanol in the scrubber, higher than -50°C, except for 2,351 hours per year, based on a 12-month rolling time period as determined at the end of each calendar month, during which the outlet vapor temperature may be greater than -50°C but shall not exceed -30°C.

When fresh methanol is used in the methanol scrubber, the condenser outlet vapor temperature may be determined using a calendar day average. When recycled methanol is used in the methanol scrubber, the condenser outlet vapor temperature shall be determined on an hourly basis. Excursions trigger an inspection,

corrective action and reporting in a semiannual report. Records of specific corrective action shall be kept onsite. **(40CFR 64.6(c)(2))**

13. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR Part 64.7(d))**
14. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR Part 64.6(c)(3), Part 64.7(c))**
15. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR Part 64.7(b))**
16. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR Part 64.9(b)(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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. 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 Part 64.9(a)(2)(i))**
6. 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 Part 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVMR631509	4 ²	45 ²	R 336.1225, 40 CFR 52.21(c) and (d)
2. SVMR631501	18 ²	45 ²	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

FGMACT DDDDD FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for existing Gas 1 (natural gas only). Boilers at major sources of HAPs per 40 CFR Part 63, Subpart DDDDD.

Emission Units: EUBOILER1, EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall only burn natural gas. ² **(40 CFR Part 63.7499(I))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the initial and subsequent tune-ups and one-time energy assessment work practice standards for each applicable boiler at the source. ² **(40 CFR Part 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4, 40 CFR 63.7510(e))**
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. ² **(40 CFR Part 63.7500(a)(3))**
3. The permittee may obtain approval from the USEPA Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. ² **(40 CFR Part 63.7500(b))**
4. The permittee must:
 - a. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. ² **(40 CFR Part 63.7540(a)(10), 40 CFR Part 63.7515(d))**
 - b. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. ² **(40 CFR Part 63.7540(a)(13))**
 - c. Follow the procedures described in SC IX 4.a through 4.f for all initial and subsequent tune ups. ² **(40 CFR Part 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)**

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).² **(40 CFR Part 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.² **(40 CFR Part 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 shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The permittee must submit a Notification of Compliance Status that includes each boiler before the close of business on the 60th day following the completion of the initial compliance demonstrations for all boiler at the facility. The Notification of Compliance Status report must contain the following information:² **(40 CFR Part 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 Part 63.7545(e)(1))**
 - b. Certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR Part 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 Part 63.7545(e)(8)(i))**
 - ii. "This facility has had an energy assessment performed according to 40 CFR 63.7530(e)." **(40 CFR Part 63.7545(e)(8)(ii))**
6. Unless the USEPA 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.5, 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:² **(40 CFR Part 63.7550(b))**
 - a. The first semi-annual compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.1, and ending on June 30 or December 31, whichever date is the first date that occurs at least 180 days after the compliance date that is specified for the source in 40 CFR 63.7495, stated in SC IX.1. When submitting an annual, biennial, or 5-

- year compliance report, the first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495 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. ² **(40 CFR Part 63.7550(b)(1))**
- b. July 31 or January 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.1. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than January 31. ² **(40 CFR Part 63.7550(b)(2), 40 CFR Part 63.7550(b)(5))**
 - c. Each subsequent semi-annual 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. ² **(40 CFR Part 63.7550(b)(3))**
 - d. Each subsequent semi-annual 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. ² **(40 CFR Part 63.7550(b)(4), 40 CFR Part 63.7550(b)(5))**
7. The permittee must include the following information in the compliance report: ² **(40 CFR Part 63.7550(c), 40 CFR Part 63.7550(c)(1))**
- a. Company and Facility name and address. ² **(40 CFR Part 63.7550(c)(5)(i))**
 - b. Process unit information, emissions limitations, and operating parameter limitations. ² **(40 CFR Part 63.7550(c)(5)(ii))**
 - c. Date of report and beginning and ending dates of the reporting period. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 63.7550(c)(5)(xvii))**
8. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below: ² **(40 CFR Part 63.7550(h))**
- a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63 Subpart DDDDD electronically to the USEPA 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. ² **(40 CFR Part 63.7550(h)(3))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee must comply with 40 CFR Part 63 Subpart DDDDD no later than 3 years after the source becomes a major source. ² **(40 CFR Part 63.7495(c)(2))**
- 2. The permittee must be in compliance with the applicable work practice standards. ² **(40 CFR Part 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. ² **(40 CFR Part 63.7515(g))**

4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following:² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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. ² **(40 CFR Part 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 applicable boiler. ² **(40 CFR Part 63.7540(a)(10)(vi)(A))**
 - ii. A description of any corrective actions taken as a part of the tune-up. ² **(40 CFR Part 63.7540(a)(10)(vi)(B))**

Footnotes:

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

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

FGMACT OOO FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Equipment subject to 40 CFR Part 63, Subpart OOO.

Emission Units: EURECFORMTK, EUMFORMCELTK, EUFRMEOHTK, EURECMEOHTK, EURXN

POLLUTION CONTROL EQUIPMENT

Cryogenic condenser (ID 631-516), and water scrubber (ID 631-501)

I. EMISSION LIMIT(S)

1. The permittee shall reduce organic HAP emissions from the combined storage vessels and aggregate batch vent streams in FGMACT_OOO by 95 weight-percent. ² **(40 CFR Part 63.1404(a)(1), 40 CFR Part 63.1408(a)(1)(ii))**
2. The permittee shall reduce the organic HAP emissions from the collection of non-reactor batch process vents in FGMACT_OOO by 62 weight percent with the water scrubber. ² **(40 CFR Part 63.1407(a)(3)(ii))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Except during a pressure release event, operate each pressure relief device in organic HAP gas or vapor service with an instrument reading of less than 500 ppm above background as described in Method 21 of 40 CFR Part 60 Appendix A. ² **(40 CFR Part 63.1411(a))**
2. The permittee shall operate each control device such that the daily average of monitored parameters, established as specified in this 40 CFR 63.1413(a)(4) remains above the minimum level or below the maximum level, as appropriate. ² **(40 CFR Part 63.1413(a)(4))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Except as allowed under 40 CFR 63.1403(b), the permittee shall comply with the provisions of 40 CFR 63.1404 through 40 CFR 63.1410, as appropriate. When emissions are vented to a control device or control technology as part of complying with this 40 CFR Part 63 Subpart OOO, emissions shall be vented through a closed vent system meeting the requirements of 40 CFR Part 63 Subpart SS (National Emission Standards for closed vent systems, control devices, recovery devices). ² **(40 CFR Part 63.1403(a))**
2. The water scrubber (ID 631-501) shall reduce organic HAP emissions by 62 weight percent for the collection of non-reactor batch process vents it controls. ² **(40 CFR Part 63.1407(a)(3)(ii))**
3. The cryogenic condenser (ID 631-516) shall reduce organic HAP emissions by 95 percent measured by weight. This condition subsumes the control efficiency requirements for aggregate batch vent streams and storage vessels in 40 CFR 63.1408(a)(2)(ii). ² **(40 CFR Part 63.1404(a)(1), 40 CFR Part 63.1405(a)(2))**
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a water flow measurement device equipped with a continuous recorder located at the scrubber (ID 631-501) influent. ² **(40 CFR Part 63.1415(a), 40 CFR Part 63.1415(b)(1)(ii), 40 CFR Part 63.1417(k))**

5. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the outlet vapor temperature from the final condensing step of the cryogenic condenser on a continuous basis.² **(40 CFR Part 63.1415(a), 40 CFR Part 63.1415(b)(3))**
6. The permittee equip each pressure relief device in organic HAP service with a device(s) or parameter monitoring system that is capable of:² **(40 CFR Part 63.1411(c))**
 - a. Identifying the pressure release;
 - b. Recording the time and duration of each pressure release; and
 - c. Notifying operators immediately that a pressure release is occurring. The device or monitoring system may be either specific to the pressure relief device itself or may be associated with the process system or piping sufficient to indicate a pressure release to the atmosphere. Examples of these types of devices and systems include, but are not limited to, a rupture disk indicator, magnetic sensor, motion detector on the pressure relief valve stem, flow monitor, or pressure monitor.

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 verify HAPs emission rates, required by 40 CFR 63.1413(a)(2), from FGMACT OOO by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR 63.1414(a). An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
2. The permittee shall verify the HAPs emission rates from FGMACT OOO, at a minimum, every five years from the date of the last test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. *Data retention.* Unless otherwise specified in this 40 CFR Part 63 Subpart OOO, the permittee shall keep copies of all applicable records and reports required by 40 CFR Part 63 Subpart OOO for at least 5 years, as specified in 40 CFR 63.1416(a)(1), with the exception listed in 40 CFR 63.1416(a)(2):² **(40 CFR Part 63.1416(a))**
 - a. All applicable records shall be maintained in such a manner that they can be readily accessed. The most recent 6 months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request. The remaining 4 and one half years of records may be retained offsite. Records may be maintained in hard copy or computer readable form including, but not limited to, on paper, microfilm, computer, floppy disk, CD-ROM, optical disc, magnetic tape, or microfiche.
 - b. If the permittee submits copies of reports to the appropriate USEPA Regional Office, the permittee is not required to maintain copies of reports. If the USEPA Regional Office has waived the requirement of 40 CFR 63.10(a)(4)(ii) for submittal of copies of reports, the permittee is not required to maintain copies of those reports.
2. Unless one or more of the conditions specified in 40 CFR 63.1409(a)(1) through (6) are met, the permittee shall monitor each heat exchange system used to cool process equipment in an affected source, according to the provisions in either 40 CFR 63.1409(b) or (c).² **(40 CFR Part 63.1409)**

3. The permittee shall comply with the requirements of 40 CFR Part 63 Subpart UU for all equipment, as defined under 40 CFR 63.1402, that contains or contacts 5 weight-percent HAP or greater and operates 300 hours per year or more, except 40 CFR 63.1030. The weight-percent HAP is determined for equipment using the organic HAP concentration measurement methods specified in 40 CFR 63.1414(a).² **(40 CFR Part 63.1410)**
4. The permittee shall keep malfunction records as specified in 40 CFR 63.1416(b)(1) through (3).² **(40 CFR Part 63.1416)**
5. *Monitoring records.* If the permittee is required to comply with 40 CFR 63.1415 and, therefore, required to keep continuous records, the permittee shall keep records as specified in 40 CFR 63.1416(c)(1) through (6).² **(40 CFR Part 63.1416(c))**
6. *Aggregate batch vent stream records.* The permittee shall comply with the recordkeeping requirements for continuous process vents specified in 40 CFR Part 63 Subpart SS.² **(40 CFR Part 63.1416(e))**
7. *Controlled batch process vent continuous compliance records.* The permittee shall keep continuous compliance records for batch process vent as specified in 40 CFR 63.1416(d)(3).² **(40 CFR Part 63.1416(d))**
8. *Establishment of parameter monitoring level records.* For each parameter monitored according to 40 CFR 63.1415(b) and Table 3 of 40 CFR Part 63 Subpart OOO, the permittee shall maintain documentation showing the establishment of the level that indicates proper operation of the control device or control technology, including the following:² **(40 CFR Part 63.1416(d)(2))**
 - a. Parameter monitoring data used to establish the level.
 - b. Identification that the parameter monitoring level is associated with a batch cycle daily average.
 - c. A definition of the batch cycle.
9. *Other records or documentation.* For continuous monitoring systems used to comply with 40 CFR Part 63 Subpart OOO, the permittee shall keep records documenting the completion of calibration checks and records documenting the maintenance of continuous monitoring systems that are specified in the manufacturer's instructions or that are specified in other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.² **(40 CFR Part 63.1416(g))**
10. The permittee shall retain the following records for heat exchange systems:² **(40 CFR Part 63.1416(g)(4))**
 - a. Monitoring data required by 40 CFR 63.1409 indicating a leak and the date when the leak was detected, and if demonstrated not to be a leak, the basis for that determination.
 - b. Records of any leaks detected by procedures subject to 40 CFR 63.1409(c)(2) and the date the leak was detected.
 - c. The dates of efforts to repair leaks.
 - d. The method or procedure used to confirm repair of a leak and the date repair was confirmed.
11. If any pressure relief device in organic HAP service releases to atmosphere as a result of a pressure release event, the permittee shall calculate the quantity of organic HAP released during each pressure release event and report this quantity as required in 40 CFR 63.1417(f)(13)(iii). Calculations may be based on data from the pressure relief device monitoring alone or in combination with process parameter monitoring data and process knowledge.² **(40 CFR Part 63.1411(c)(2))**
12. For pressure relief devices in organic HAP service, the permittee shall keep records of the information specified in 40 CFR 63.1416(g)(5)(i) through (v), as applicable:² **(40 CFR Part 63.1416(g)(5))**
 - a. A list of identification numbers for pressure relief devices that vent to a fuel gas system, process, drain system, or closed-vent system and control device, under the provisions in 40 CFR 63.1411(d).
 - b. A list of identification numbers for pressure relief devices subject to the provisions in 40 CFR 63.1411(a).
 - c. A list of identification numbers for pressure relief devices equipped with rupture disks, under the provisions in 40 CFR 63.1411(b)(2).
 - d. The dates and results of the monitoring following a pressure release for each pressure relief device subject to the provisions in 40 CFR 63.1411(a) and (b). The results shall include:
 - i. The background level measured during each compliance test.
 - ii. The maximum instrument reading measured at each piece of equipment during each compliance test.

- e. For pressure relief devices in organic HAP service subject to 40 CFR 63.1411(c), keep records of each pressure release to the atmosphere, including the following information:
 - i. The source, nature, and cause of the pressure release.
 - ii. The date, time, and duration of the pressure release.
 - iii. An estimate of the quantity of total HAP emitted during the pressure release and the calculations used for determining this quantity.
 - iv. The actions taken to prevent this pressure release.
 - v. The measures adopted to prevent future such pressure.

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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The permittee shall submit all reports required by 40 CFR 63.1417(a).² **(40 CFR Part 63.1417(a))**
6. *Submittals.* The permittee shall submit all reports required under 40 CFR Part 63 Subpart OOO to the Administrator at the appropriate address listed in 40 CFR 63.13. If acceptable to both the Administrator and the permittee, reports may be submitted on electronic media.² **(40 CFR Part 63.1417(c))**
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), as described in Table 5 to 40 CFR Part 63 Subpart OOO.² **(40 CFR Part 63.1417)**
8. The permittee shall submit a Notification of Compliance Status pursuant to 40 CFR 63.1417(e).² **(40 CFR Part 63.1717(e))**
9. The permittee shall submit all Periodic Reports pursuant to 40 CFR 63.1417(f).² **(40 CFR Part 63.1717(f))**
10. If the permittee fails to meet an applicable standard, the permittee shall report such events in the Semi-Annual Report and shall report the number of failures to meet an applicable standard. For each instance, the permittee shall report the date, time and duration of each failure. For each failure the report must include a list of the affected sources or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions.² **(40 CFR Part 63.1417(g))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63 Subpart A and Subpart OOO National Emission Standards for Hazardous Air Pollutant Emissions: Manufacture of Amino/Phenolic Resins. (40 CFR Part 63 Subparts A and OOO), as specified in USEPA Administrative Consent Order EPS-5-17-113(a)-MI-03. A startup, shutdown, and malfunction plan (SSMP) typically required by 40 CFR 63.6(e)(3) is not required for 40 CFR Part 63 Subpart OOO. ² **(40 CFR Part 63, Subpart OOO)**

Footnotes:

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

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

FGMACT ZZZZ FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Existing emergency generator exempt from Permit to Install requirements pursuant to Rule 285(g) and subject to 40 CFR 63, Subpart ZZZZ.

Emission Units: EU-CUMMINS_ENG and EU-DET_DIESEL_ENG

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain any affected RICE, 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 Part 63.6605(b))**
2. To be considered an emergency stationary RICE under Subpart ZZZZ, the permittee shall limit operation of FGMACT_ZZZZ as follows:
 - a. There is no time limit on the use of FGMACT_ZZZZ in emergency situations **(40 CFR Part 63.6640(f)(1))**. The permittee may operate FGMACT_ZZZZ for a maximum of 100 hours per year for 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 owner or operator 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 calendar year. **(40 CFR Part 63.6640(f)(2)(i))**
 - b. The permittee may operate FGMACT_ZZZZ up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to supply power to an electric grid. **(40 CFR Part 63.6640(f)(3))**
3. The permittee must conduct the following:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first.
 - b. Inspect air cleaner (compression ignition units) or spark plugs (spark ignition units) every 1,000 hours of operation or annually whichever comes first, and replace as necessary.
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. **(40 CFR Part 63.6602, Table 2c to Subpart ZZZZ of Part 63)**

4. The permittee must operate and maintain the stationary RICE and after treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR Part 63.6625(e), 40 CFR Part 63.6640(a), Table 6)**
5. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time 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) in Table 2c to Subpart ZZZZ of Part 63 apply. **(40 CFR Part 63.6625(h))**
6. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6602 as listed in SC III.4. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i) for CI engines or 40 CFR 63.6625(j) for SI engines. **(40 CFR Part 63.6625(i) and (j))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each existing emergency stationary RICE with a non-resettable hour meter. **(40 CFR Part 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 for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content. **(40 CFR Part 63.6625(i))**
2. If using the oil analysis program for SI Engine(s), the permittee shall test for Total Acid Number, viscosity and percent water content. **(40 CFR Part 63.6625(j))**

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 the hours of operation of FGMACT_ZZZZ. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1201(3))**
2. The permittee shall maintain a log of the hours of operation, including reason (i.e.: emergency, maintenance testing, readiness testing). **(40 CFR Part 63.6640)**
3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the engine and after-treatment device (if any) was operated and maintained according to the maintenance plan. **(40 CFR Part 63.6655(e))**
4. The permittee must keep records of the occurrence and duration of each malfunction of operation of the engine, or air pollution control and monitoring equipment, if installed. **(40 CFR Part 63.6655(a)(2))**
5. The permittee shall keep in a satisfactory manner, 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, if installed, to its normal or usual manner of operation. **(40 CFR Part 63.6655(a)(5))**

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 any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants from Stationary Reciprocating Internal Combustion Engines. **(R336.1213(3), 40 CFR Part 63, Subpart ZZZZ)**

Footnotes:

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

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

FGCOLDCLEANERS 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: EUCOLDCLEANERS

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

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain 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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: EUMF_III_BLEND, EUMF_3000_BLEND, EUMF_6000_BLEND, EUMF_III_PACK, EUMF_3000_PACK, EUMF_6000_PACK

Emission Units installed prior to December 20, 2016: NA

POLLUTION CONTROL EQUIPMENT

Fabric filter serving EUMF_III_PACK, EUMF_3000_PACK, EUMF_6000_PACK

I. EMISSION LIMIT(S)

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

- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**
- 2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:
 - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: **(R 336.1290(2)(b)(i), R 336.1910)**
 - 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 permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. **(R 336.1290(2)(b)(ii), R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

- e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in enough detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**
- f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**
2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

If the permittee chooses to use record form EQP3558 for its Rule 290 emission unit(s), the permittee has the option of placing the form in Appendix 4 of the ROP. The latest version of the form is available on the EGLE, AQD website. The permittee is not required to include record form EQP3558 in their ROP.

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

ROP No: MI-ROP-B1677-2018a
Expiration Date: December 6, 2023
PTI No: MI-PTI-B1677-2018a

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTI and/or Operate that relates to the identified emission units or flexible groups as of the effective date of this ROP. This includes all PTI and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-B1677-2016. The PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
418-96H	Entire Facility, except for the two emergency generators.	FGBOILERS FGMACT_DDDDD FGMACT_OOO FGMRPT EUMACT_EEEE

The following table lists the ROP amendments or modifications issued after the effective date of ROP No. MI-ROP-B1677-2018.

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
418-96I	201900072 / August 6, 2019	Incorporate PTI 418-96I which was to add requirements to the PTI based on a USEPA consent agreement and final order (CAFO). The company also identified four emission units in FGZYREZ (EUCYREZSTTK, EUCYREZHDTK EUCYREZBLND, and EUCYREZPKG). And added requirements to use the newly-installed water scrubber when operating	EUCYREZSTTK EUCYREZHDTK EUCYREZBLND EUCYREZPKG FGZYREZ FGMRPT

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
		<p>FGCYREZ. (The CAFO required 90% removal of organic HAP.)</p> <p>Along with the CAFO-related requirements, the company removed the requirements to read visible emissions from FGCYEZ equipment.</p> <p>Additional changes to the facility's permit included:</p> <ul style="list-style-type: none"> • FGCYREZ: include Group 1 requirements under the National Emission Standards for NESHAP in 40 CFR Part 63, Subpart FFFF [the Miscellaneous Organic NESHAP (MON)]. This would involve replacing the 10,000 pounds per year emission limit for uncontrolled organic HAP with a 98% removal requirement for organic HAP, verified by the results of the stack test required by the CAFO. And change the condition related to the MON, related to the change from Group 2 to Group 1 • FGMRPT: Based on recent stack test data, the PTI removed the restriction on hours of operation using fresh methanol in the methanol scrubber. <p>PTI 418-96l application was not required to go through the public participation process.</p>	

Appendix 7. Emission Calculations

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

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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