

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

EFFECTIVE DATE: May 15, 2019

ISSUED TO

**WestRock California, LLC**

State Registration Number (SRN): B4072

LOCATED AT

177 Angell Street, Battle Creek, Michigan 49015-1598

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B4072-2019

Expiration Date: May 15, 2024

Administratively Complete ROP Renewal Application Due Between  
November 15, 2022 and November 15, 2023

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

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-B4072-2019

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

Michigan Department of Environmental Quality

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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.

## 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).<sup>2</sup> **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

### **Emission Limits**

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

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

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

### **Testing/Sampling**

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

## Monitoring/Recordkeeping

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

## Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which 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.<sup>2</sup> **(R 336.1912)**

## Permit Shield

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

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

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

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

### Revisions

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

### Reopenings

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



## Renewals

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

## Stratospheric Ozone Protection

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

## Risk Management Plan

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

## Emission Trading

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

## Permit to Install (PTI)

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

### **Footnotes:**

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

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

## **B. SOURCE-WIDE CONDITIONS**

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

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

## SOURCE-WIDE CONDITIONS

### DESCRIPTION

All process equipment source-wide including equipment covered by other permits, grandfathered equipment, and exempt equipment.

### POLLUTION CONTROL EQUIPMENT

NA

### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Source-Wide	SC VI.2	<b>R 336.1205(3)</b>
2. Aggregate HAP	Less than 22.5 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Source-Wide	SC VI.2	<b>R 336.1205(3)</b>

### II. MATERIAL LIMIT(S)

NA

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

NA

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

NA

### V. TESTING/SAMPLING

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

1. The permittee shall determine the HAP content of any material (e.g. coatings, washer liquids, etc.) as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.<sup>2</sup> **(R 336.1205(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 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(3))**
2. The permittee shall keep the following information on a calendar month basis:
  - a. The quantity of each HAP containing material used or emitted.

- b. The HAP emission factor of each HAP containing material used or emitted. (Emission factors are to be based on manufacturer's formulation data, testing, industry information (e.g. NCASI published emission factors), EPA emission factor, or as approved by the AQD District Supervisor.)
- c. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- d. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the department upon request.<sup>2</sup> (R 336.1205(3))

## **VII. REPORTING**

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

See Appendix 8

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

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

NA

## **IX. OTHER REQUIREMENT(S)**

NA

### **Footnotes:**

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

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

### C. EMISSION UNIT SPECIAL CONDITIONS

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

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA 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
EU-COLDCLEANERS	Cold cleaner parts washers.	01-01-1948	FG-COLDCLEANERS
EU-BLR-0001	Springfield 1 steam generating boiler rated at 107 MMBtu/hr maximum rated heat input. Fuels: Natural gas is primary fuel source with back-up fuels No. 2 fuel oil, yellow grease, or No. 6 fuel oil. No control devices.	01-01-1948	FG-BOILERS
EU-BLR-0002	Springfield 2 steam generating boiler rated at 107 MMBtu/hr maximum rated heat input. Fuels: Natural gas is primary fuel source with back-up fuels No. 2 fuel oil, yellow grease, or No. 6 fuel oil. No control devices.	01-01-1948	FG-BOILERS
EU-STOCKPREP	Miscellaneous raw material mixing and processing vessels used in the preparation of the recycled paper fibers where various VOC containing additives are mixed in with the pulp slurry.	01-01-1948 01-01-1980 05-20-2013	FG-PAPERMAKING
EU-PAPERMACHINE	Five Beloit Belbond multi-ply formers for the wet end process with felt wash located under the wet end process of the paper machine, and a dry end where various coatings are applied and dried in natural gas-fired ovens. The finished paper is rolled onto a reel at the end of the paper machine.	01-01-1948 01-01-1980 05-20-2013	FG-PAPERMAKING
EU-COATING	Application of coating in the dry end of the paper machine includes the application of latex adhesive, which is used to bind the coating to the paperboard. Coatings are formulated from various liquids, slurries, solids, and dried in natural gas-fired ovens. Kaolin usage in paper process has a separate exhaust system for particulate.	01-01-1948 08-13-2008 05-20-2013	NA
EU-FIRE-PUMP-ENGINE	Emergency fire pump engine used to provide power to pump water for fire suppression or protection.	08-11-2009/ NA	NA

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date/ Modification Date</b>	<b>Flexible Group ID</b>
EU-REW-0001	Machine that performs the winding of the final product on to rolls for shipment (Building 23).	01-01-1948/ NA	NA

**EU-COATING  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Application of coating in the dry end of the paper machine includes the application of latex adhesive, which is used to bind the coating to the paperboard. Coatings are formulated from various liquids, slurries, solids, and dried in natural gas-fired ovens. Kaolin usage in paper process has a separate exhaust system for particulate.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	6.9 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EU-COATING	SC VI.1, VI.2, VI.3	<b>R 336.1702(a)</b>
2. PM	0.10 lbs per 1000 lbs of exhaust gas <sup>a2</sup>	Hourly	SVCoatDry5 portion of EU-COATING	SC VI.4, VI.5	<b>R 336.1331(1)(a)</b>

<sup>a</sup> Calculated on a wet gas basis

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

1. The permittee shall equip and maintain EU-COATING with roller coating applicators or comparable technology with equivalent transfer efficiency.<sup>2</sup> **(R 336.1702(a))**

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1225, R 336.1702)**



2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a calendar month basis for the coating portions of EU-COATING:
  - a. Quantity of each coating material used.
  - b. VOC content, percent by weight, of each coating material as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.<sup>2</sup> **(R 336.1702)**
4. The permittee shall perform and record the results of a weekly 6-minute visible emission check of SVCoatDry5 during daylight hours under routine maximum operating conditions. The permittee shall record (yes or no) whether visible emissions are observed.<sup>2</sup> **(R 336.1301, R 336.1331)**
5. If visible emissions are observed during the weekly 6-minute check of SVCoatDry5, the permittee shall initiate a preventive maintenance check of EU-COATING within four hours to determine and correct for any noted abnormal operating conditions. **(R 336.1213(3))**

**VII. REPORTING**

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

See Appendix 8

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

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCoatDry1	14 x 20 <sup>2</sup>	60 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
2. SVCoatDry2*	16 x 30 <sup>2</sup>	44 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
3. SVCoatDry3(IR)*	10 x 30 <sup>2</sup>	48 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
4. SVCoatDry4*	36 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
5. SVCoatDry5**	24 x 27 <sup>2</sup>	49 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)

\* Horizontal Discharge, \*\* Goose Neck Downward

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

**EU-FIRE-PUMP-ENGINE  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Emergency fire pump engine used to provide power to pump water for fire suppression or protection.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NMHC + NOx	7.8 g/HP-hr	Hourly	EU-FIRE-PUMP-ENGINE	SC V.1 or VI.2	<b>40 CFR 60.4205(c)</b>
2. CO	3.7 g/HP-hr	Hourly	EU-FIRE-PUMP-ENGINE	SC V.1 or VI.2	<b>40 CFR 60.4205(c)</b>
3. PM	0.6 g/HP-hr	Hourly	EU-FIRE-PUMP-ENGINE	SC V.1 or VI.2	<b>40 CFR 60.4205(c)</b>

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Diesel Fuel	Sulfur content shall not exceed 15 ppm	Instantaneous	EU-FIRE-PUMP-ENGINE	SC VI.3	<b>40 CFR 60.4207(b) 40 CFR 80.510(b)</b>

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

1. The permittee shall operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4205 over the entire life of EU-FIRE-PUMP-ENGINE. **(40 CFR 60.4206)**
2. The permittee shall maintain and operate EU-FIRE-PUMP-ENGINE per the manufacturer’s emission related written instructions. **(40 CFR 60.4211(a)(1))**
3. The permittee shall operate EU-FIRE-PUMP-ENGINE according to the requirements in 40 CFR 60.4211(f)(1) through (3). In order for EU-FIRE-PUMP-ENGINE to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs 40 CFR 60.4211(f)(1) through (3), is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs 40 CFR 60.4211(f)(1) through (3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. There is no time limit on the use of EU-FIRE-PUMP-ENGINE in emergency situations. **(40 CFR 60.4211(f), 40 CFR 60.4211(f)(1))**

4. The permittee may operate EU-FIRE-PUMP-ENGINE for any combination of the purposes specified in 40 CFR 60.4211(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 40 CFR 60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by 40 CFR 60.4211(f)(2). **(40 CFR 60.4211(f)(2))**
  - a. EU-FIRE-PUMP-ENGINE may be operated 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 ICE beyond 100 hours per calendar year.
  - b. EU-FIRE-PUMP-ENGINE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 40 CFR 60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
  - c. EU-FIRE-PUMP-ENGINE may be operated for periods where there is a deviation of voltage or frequency of 5% or greater below standard voltage or frequency.
5. The permittee may operate EU-FIRE-PUMP-ENGINE for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in 40 CFR 60.4211 (f)(2). Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. **(40 CFR 60.4211(f)(3))**
  - a. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all the following conditions are met:
    - i. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
    - ii. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
    - iii. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
    - iv. The power is provided only to the facility itself or to support the local transmission and distribution system.
    - v. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

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

1. The permittee shall install a non-resettable hour meter on EU-FIRE-PUMP-ENGINE prior to startup of the engine. **(40 CFR 60.4209(a))**

**V. TESTING/SAMPLING**

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

1. Within 180 days after issuance of this permit, the permittee shall verify NMHC + NOx, CO, and PM emission rates from EU-FIRE-PUMP-ENGINE by testing at owner's expense, in accordance with the department requirements or provide manufacturer certification documentation as required in SC VI.2. If testing is to be performed, it shall be done using an approved USEPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
NOx	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix 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, 40 CFR 60.4211)

2. The permittee shall verify the NMHC + NOx, CO, and PM emission rates from EU-FIRE-PUMP-ENGINE, at a minimum, every five years from the date of the last test or maintain manufacturer certification documentation as required in SC VI.2. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.4211)
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. (R 336.1213(3), R 336.2001(4))

See Appendix 5

**VI. MONITORING/RECORDKEEPING**

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

6. The permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation, non-emergency operation and demand response operation. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 60.4214(b))
7. The permittee shall keep, in a satisfactory manner, a record of testing required in SC V.1 or manufacturer certification documentation indicating that EU-FIRE-PUMP-ENGINE meets the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60, Subpart IIII. The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)
8. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in EU-FIRE-PUMP-ENGINE, demonstrating that the fuel sulfur content meets the requirement of 40 CFR 80.510(b). The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. (40 CFR 60.4207(b), 40 CFR 80.510(b))

**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)**

NA

**IX. OTHER REQUIREMENT(S)**

1. Section 63.6590(c) of 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)) provides that any affected source subject to the Subpart ZZZZ criteria in 40 CFR 63.6590(c) is subject to 40 CFR Part 60, Subpart IIII for compression ignition engines. Therefore, the permittee shall comply with 40 CFR Part 63, Subpart ZZZZ by complying with all the applicable provisions of the federal Standards of Performance for New Stationary Sources for Stationary Compression Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and IIII. **(40 CFR Part 60, Subparts A and IIII, 40 CFR 63.6590(c))**

**Footnotes:**

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

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

**EU-REW-0001  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A machine that performs the winding of final product onto rolls for shipment (Building 23).

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lb / 1000 lbs of exhaust gas	Hourly	EU-REW-0001	SC VI.1, VI.2	<b>R 336.1331(1)(a), Table 31J</b>

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall perform and record the results of a weekly six-minute visible emission check of SV-REW-001 during daylight hours under routine maximum operating conditions and during start-up conditions. The permittee shall record (yes or no) whether visible emissions are observed. **(R 336.1213(3))**
2. If visible emissions are observed during the weekly 6-minute check of SV-REW-0001, the permittee shall initiate a preventive maintenance check of EU-REW-0001 within four hours to determine and correct for any noted abnormal operating conditions. **(R 336.1213(3))**

**VII. REPORTING**

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

See Appendix 8

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

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-REW-0001*	22 X 15	27.7	R 336.1213(3)

\*Stack is discharged horizontally.

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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



## D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA 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
FG-COLDCLEANERS	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.	EU-COLDCLEANERS
FG-BOILERS	Two natural gas fired boilers with back-up fuels as No. 2 fuel oil, yellow grease and No. 6 fuel oil. Maximum rated heat input for each boiler is 107 MMBTU per hour.	EU-BLR-0001 EU-BLR-0002
FG-PAPERMAKING	Boxboard production including pulping and the wet end process on the paper machine including felt wash.	EU-STOCKPREP EU-PAPERMACHINE

## **FG-COLDCLEANERS FLEXIBLE GROUP CONDITIONS**

### **DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

**Emission Unit:** EU-COLDCLEANERS

### **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

**FG-BOILERS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Two natural gas fired boilers with back-up fuels as No. 2 fuel oil, yellow grease, and No. 6 fuel oil. Maximum rated heat input for each boiler is 107 MMBTU per hour.

**Emission Units:** EU-BLR-0001, EU-BLR-0002

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.049 lb / MMBtu* <sup>2</sup>	Hourly	EU-BLR-0001	SC V.1	<b>R 336.1205(3)</b>
2. Particulate	0.049 lb / MMBtu* <sup>2</sup>	Hourly	EU-BLR-0002	SC V.1	<b>R 336.1205(3)</b>

\* When firing yellow grease

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel Oil	1.5% Sulfur by weight <sup>2</sup>	Instantaneous	FG-BOILERS	SC V.4, V.5	<b>R 336.1401</b>
2. Yellow Grease	16,000 tons <sup>2</sup>	Per 12-Month Rolling Time Period	FG-BOILERS	SC VI.5	<b>R 336.1205(3)</b>

3. The boiler shall comply with the definition of the oil subcategory: the boiler burns any liquid fuel and is not in either the biomass or coal subcategories. **(40 CFR 63, 63.11200(c), 40 CFR 63.11237)**

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

1. FG-BOILERS shall only be fired with pipeline quality natural gas, as defined in 40 CFR 72.2, yellow grease and/or fuel oil.<sup>2</sup> **(R 336.1201(3))**
2. The permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to 40 CFR Part 63, Subpart JJJJJJ that applies to the permittee's boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 of 40 CFR Part 63, Subpart JJJJJJ satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. **(40 CFR 63.11201(b))**
3. The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of 40 CFR 63.11223, as listed below. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. **(40 CFR 63.11223(b))**

- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.11223(b)(1))**
- b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.11223(b)(2))**
- 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, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.11223(b)(3))**
- d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. **(40 CFR 63.11223(b)(4))**
- e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.11223(b)(5))**
- f. Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of 40 CFR 63.11223, as listed below. **(40 CFR 63.11223(b)(6))**
  - i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. **(40 CFR 63.11223(b)(6)(i))**
  - ii. A description of any corrective actions taken as a part of the tune-up of the boiler. **(40 CFR 63.11223(b)(6)(ii))**
  - iii. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. **(40 CFR 63.11223(b)(6)(iii))**
- g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. **(40 CFR 63.11223(b)(7))**

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

1. The boiler shall have a heat input capacity of equal to or greater than 10 MMBTU per hour. **(40 CFR Part 63, Subpart JJJJJ)**

#### **V. TESTING/SAMPLING**

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

1. When firing yellow grease, the permittee shall verify particulate matter emission rates from EU-BLR-0001 and EU-BLR-0002 by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A; 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 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(40 CFR 52.21, R 336.1201(3), R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
2. When firing yellow grease, the permittee shall verify the particulate matter emission rates from EU-BLR-0001 and EU-BLR-0002, 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 7 days of the time and place before performance tests are conducted. **(R 336.1213(3), R 336.2001(4))**
4. Testing of fuel sulfur content, in weight percent, of oil in storage tank shall be done either by supplier or laboratory analysis. Fuel sulfur testing shall use the appropriate ASTM test method or an approved equivalent test method. If using purchase records for ASTM specification fuel oil or analysis provided by the vendor to show compliance with the above fuel sulfur content limit, the permittee shall verify the fuel oil sulfur content, by testing, at least once per calendar year. **(R 336.1213(3))**
5. Fuel oil sulfur content test results, including the test method used, shall be submitted to the AQD within 60 days of the test date. **(R 336.2001(5))**

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. The permittee shall record the monthly natural gas usage rates in million cubic feet. **(R 336.1213(3))**
2. The permittee shall record the monthly fuel oil usage rates in gallons. **(R 336.1213(3))**
3. The permittee shall keep a record of the sulfur content, by weight, of each delivery of fuel oil. The sulfur content determination shall be done either by supplier certification or laboratory analysis.<sup>2</sup> **(R 336.1201(3))**
4. The permittee shall keep a record of the monthly yellow grease fuel usage, in gallons, for FG-BOILERS. All records shall be compiled at the end of each calendar month.<sup>2</sup> **(40 CFR 52.21, R 336.1201(3))**
5. The permittee shall keep a record of annual yellow grease fuel usage in tons per year, based on a 12-month rolling time period for FG-BOILERS. All records shall be compiled at the end of each calendar month.<sup>2</sup> **(40 CFR 52.21, R 336.1201(3))**
6. To ensure proper operation when firing fuel oil or yellow grease, the permittee shall perform and record the results of a daily 6-minute visible emission check of SV-BLR-0001 and SV-BLR-0002 during daylight hours as specified in Appendix 3.A. **(R 336.1213(3))**
7. The permittee must maintain the records specified in paragraphs (c)(1) through (7) of 40 CFR 63.11225, as listed below. **(40 CFR 63.11225(c))**
  - a. As required in 40 CFR 63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted. **(40 CFR 63.11225(c)(1))**
  - b. The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR 63.11214 and 40 CFR 63.11223 as specified in paragraphs (c)(2)(i) and (iii) of 40 CFR 63.11225, as listed below. **(40 CFR 63.11225(c)(2))**
    - i. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. **(40 CFR 63.11225(c)(2)(i))**
    - iii. For each boiler required to conduct an energy assessment, the permittee must keep a copy of the energy assessment report. **(40 CFR 63.11225(c)(2)(iii))**
  - c. Records of the occurrence and duration of each malfunction of the boiler. **(40 CFR 63.11225(c)(4))**
  - d. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), stated in SC IX.3, including corrective actions to restore the malfunctioning boiler to its normal or usual manner of operation. **(40 CFR 63.11225(c)(5))**

8. The permittee's records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years. **(40 CFR 63.11225(d))**

**See Appendices 3 and 9**

## **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 prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of 40 CFR 63.11225. For boilers that are subject only to a requirement to conduct a biennial tune-up according to 40 CFR 63.11223(a) and not subject to emission limits or operating limits, the permittee may prepare only a biennial compliance report as specified in paragraphs (b)(1) and (2) of 40 CFR 63.11225, as listed below. **(40 CFR 63.11225(b))**
  - a. Company name and address. **(40 CFR 63.11225(b)(1))**
  - b. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR Part 63, Subpart JJJJJJ. The permittee's notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR 63.11225(b)(2))**
    - i. "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler." **(40 CFR 63.11225(b)(2)(i))**
    - ii. For units that do not qualify for a statutory exemption as provided in Section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit." **(40 CFR 63.11225(b)(2)(ii))**
6. If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within 40 CFR Part 63, Subpart JJJJJJ, in the boiler becoming subject to 40 CFR Part 63, Subpart JJJJJJ, or in the boiler switching out of 40 CFR Part 63, Subpart JJJJJJ due to a change to 100 percent natural gas, or the permittee has taken a permit limit that resulted in the permittee being subject to 40 CFR Part 63, Subpart JJJJJJ, the permittee must provide notice of the date upon which the permittee switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify: **(40 CFR 63.11225(g))**
  - a. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice. **(40 CFR 63.11225(g)(1))**
  - b. The date upon which the fuel switch, physical change, or permit limit occurred. **(40 CFR 63.11225(g)(2))**



See Appendix 8

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

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-BLR-0001	NA	117 <sup>1</sup>	<b>R 336.1901</b>
2. SV-BLR-0002	NA	117 <sup>1</sup>	<b>R 336.1901</b>

**IX. OTHER REQUIREMENT(S)**

1. 40 CFR Part 63, Subpart JJJJJJ applies to each existing affected source as defined in paragraph (a)(1) of 40 CFR 63.11194, as listed below. **(40 CFR 63.11194(a))**
  - a. The affected source of 40 CFR Part 63, Subpart JJJJJJ is the collection of all existing industrial, commercial, and institutional boilers within a subcategory, as listed in 40 CFR 63.11200 and defined in 40 CFR 63.11237, located at an area source. **(40 CFR 63.11194(a)(1))**
2. An affected source is an existing source if the permittee commenced construction or reconstruction of the affected source on or before June 4, 2010. **(40 CFR 63.11194(b))**
3. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee 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 that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.11205(a))**
4. For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within 40 CFR Part 63, Subpart JJJJJJ or the boiler becoming subject to 40 CFR Part 63, Subpart JJJJJJ, the permittee must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to 40 CFR 63.11225(g), stated in SC VII.8. **(40 CFR 63.11210(h))**
5. Table 8 to 40 CFR Part 63, Subpart JJJJJJ shows which parts of the General Provisions in 40 CFR 63.1 through 40 CFR 63.15 apply to the permittee. **(40 CFR 63.11235)**

**Footnotes:**

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

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

**FG-PAPERMAKING  
 FLEXIBLE GROUP CONDITIONS**

Boxboard production including pulping and the wet end process on the paper machine including felt wash.

**Emission Units:** EU-STOCKPREP, EU-PAPERMACHINE

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	30.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Pulping and wet end portion of FG-PAPERMAKING	SC VI.1, VI.3, VI.4	<b>R 336.1702(a)</b>
2. VOC	0.7 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Felt wash portion of FG-PAPERMAKING	SC VI.1, VI.2, VI.5	<b>R 336.1702(a)</b>

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Maximum Paper Production	219,000 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FG-PAPERMAKING	SC VI.1, VI.3	<b>R 336.1205(1)(a)</b>

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

NA

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

NA

**V. TESTING/SAMPLING**

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

NA

## **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702)**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period paper production records for FG-PAPERMAKING. The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> **(R 336.1205(1)(a))**
4. The permittee shall keep the following information on a calendar month basis for the FG-PAPERMAKING:
  - a. Pounds of paper produced.
  - b. The National Council for Air and Steam Improvement emission factors or emission factors acceptable to the AQD District Supervisor may be used for calculating VOC emissions.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.<sup>2</sup> **(R 336.1205, R 336.1702)**

5. The permittee shall keep the following information on a calendar month basis for the felt washing portion of FG-PAPERMAKING:
  - a. Quantity of each felt wash material used.
  - b. VOC content of each felt wash material as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the department upon request.<sup>2</sup> **(R 336.1702)**

## **VII. REPORTING**

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

**See Appendix 8**

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

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
<b>Stock Preparation Area Stacks/Vents</b>			
1. SVStkPrep1	48 <sup>2</sup>	57 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
2. SVStkPrep2	48 <sup>2</sup>	57 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
3. SVStkPrep3	48 <sup>2</sup>	57 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
4. SVStkPrepN*	48 <sup>2</sup>	33 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
5. SVStkPrepS*	54 <sup>2</sup>	26 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
6. SVStkPrepE*	48 <sup>2</sup>	46 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
7. SVStkPrepW*	54 <sup>2</sup>	46 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
<b>Wet-End Area Vents</b>			
8. SVBBW0001	48 <sup>2</sup>	65 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
9. SVBBW0002	48 <sup>2</sup>	65 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
10. SVBBW0003	48 <sup>2</sup>	65 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
11. SVBBW0004	48 <sup>2</sup>	63 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
12. SVBBW0005	48 <sup>2</sup>	63 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
<b>Dry-End Area Stacks/Vents</b>			
13. SVBBD0001*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
14. SVBBD0002*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
15. SVBBD0003*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
16. SVBBD0004*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
17. SVBBD0005*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
18. SVBBD0006*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
19. SVBBD0007*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
20. SVBBD0008*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
21. SVBBD0009*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
22. SVBBD0010*	42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
23. SVBBD0011*	42 x 42 <sup>2</sup>	36 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
24. SVBBD0012	48 <sup>2</sup>	64 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
25. SVBBD0013	48 <sup>2</sup>	63 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
26. SVBBD0014	48 <sup>2</sup>	64 <sup>2</sup>	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)

\* Horizontal Discharge

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

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

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

## APPENDICES

### Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO <sub>2</sub> e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
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 <sub>2</sub> 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 <sub>x</sub>	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 <sub>2</sub>	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

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-BOILERS.

### A. Monitoring Requirements for FG-BOILERS

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in the FG-BOILERS table when firing fuel oil or yellow grease unless an alternative format is approved by the AQD District Supervisor:

1. The permittee shall perform and record the results of a 6-minute visible emission check of SV-BLR-0001 and SV-BLR-0002 immediately after each start-up occurrence. For each 24-hour period that fuel oil or yellow grease is continuously fired, then the permittee shall perform and record the results of a six-minute visible emission check of SV-BLR-0001 and SV-BLR-0002 during maximum routine operating conditions. **(R 336.1213(3))**
2. If visible emissions are observed at start-up or during maximum routine operating conditions, the permittee shall then perform and record the results of a 6-minute visible emission check of SV-BLR-0001 and/or SV-BLR-0002 at least once every 30 minutes thereafter, until visible emissions are no longer observable or until visible emissions are observable for more than two hours. **(R 336.1213(3))**
3. If visible emissions are still noticeable within two hours of the initial observance, the permittee shall proceed with the Preventative Maintenance Plan included in Appendix 9A. **(R 336.1213(3))**

NOTE: The purpose of the 6-minute visible emission check is to verify (yes or no) whether visible emissions are observed. Therefore, the permittee should record a positive or a negative response for each visible emission check that is performed.

## Appendix 4. Recordkeeping

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

## Appendix 5. Testing Procedures

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

## Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B4072-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B4072-2014a is being reissued as Source-Wide PTI No. MI-PTI-B4072-2019.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201500205	Facility name change from Rock Tenn Company to WestRock California, Inc. due to a company merger.	NA

**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.

**B. Other Reporting**

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

**Appendix 9. Preventative Maintenance Plan**

**A. Preventative Maintenance Plan for FG-BOILERS**

Any request by the permittee to change the Preventative Maintenance Plan in Appendix 9 must be submitted in writing to the AQD District Supervisor for review and approval. **(R 336.1213(3))**

If visible emissions are observed for more than two hours using the methods set forth in Appendix 3.A., the permittee shall implement the following procedures:

1. Stop firing fuel oil or yellow grease and convert to firing natural gas or perform and record the results of a Federal Reference Test Method 9 visible emission observation of SV-BLR-0001 and/or SV-BLR-0002 within two hours.
2. Whatever option is chosen in (1) above, the permittee shall determine the cause of visible emissions within two hours of discovery, identify possible corrective measures within eight hours and implement the most practically feasible corrective measures which will reduce/eliminate visible emissions.
3. If a Federal Reference Test Method 9 visible emission observation is performed and indicates a violation of the opacity standard specified in R 336.1301 (See General Condition No. 11.), the permittee shall immediately notify the AQD as required in General Condition No. 11; or stop firing fuel oil or yellow grease and convert to firing natural gas.
4. If a Federal Reference Test Method 9 visible emission observation is performed and indicates that the opacity from FG-BOILERS is in compliance with R 336.1301, then the permittee may continue to fire fuel oil or yellow grease and continue with the schedule of daily 6-minute visible emission checks.