MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

EFFECTIVE DATE: October 21, 2018

ISSUED TO

Hutchinson Antivibration Systems, Inc.

State Registration Number (SRN): E5094

LOCATED AT:

460 Fuller Avenue NE, Grand Rapids, Michigan 49503

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-E5094-2018

Expiration Date: October 21, 2023

Administratively Complete ROP Renewal Application Due Between April 21, 2022 and April 21, 2023

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-E5094-2018

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

Michigan Department of Environmental Quality

Heidi Hollenbach, Grand Rapids 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 Environmental Quality (MDEQ) or his or her designee.

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

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

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

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

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order AQD No. 25-2016, entered on August 22, 2016 between the MDEQ and the permittee.

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

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

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (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, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² (R 336.1912)

Permit Shield

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

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

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

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

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))

NA

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- 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)

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

Footnotes:

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCARBON	Carbon black transport system. Gravity feed of carbon from truck to hopper. Pneumatic transfer of carbon from hopper to four (4) silos, with baghouse filters.	05/01/1988, 06/30/1988	NA
EUMIX	Four rubber mills and one mixer, all venting to one external baghouse.	03/01/1988, 05/01/1988, 12/21/2016	NA
EUWHEEL	Wheelabrator Tumblast, controlled by an externally venting Wheelabrator dust collector.	06/01/1979	NA
EURUBBERMIX2	Rubber mixer controlled by externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.	02/20/2006	FGRULE290
EU002CLEAN	Six small wash stations for cleaning parts.	01/01/1980, 01/01/1981	FGCOLDCLEANERS
EUSIL01	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1988, 05/12/2015	FGRTO FGMMMM FGCAM
EUSIL02	A turbo spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1989, 05/12/2015	FGRTO FGMMMM FGCAM

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSIL03	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1989, 05/12/2015	FGRTO FGMMMM FGCAM
EUSIL04	A spray system used for applying cement to metal and plastic parts. The system consists of a steam heated tunnel, a primer application booth, a topcoat application booth and a steam heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	10/01/1991, 05/12/2015	FGRTO FGMMMM FGCAM
EUCOE01	Chain-on-edge number 1 is two (2) automated spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the robot-mounted spray guns. VOC emissions from this line are controlled by a common regenerative thermal oxidizer.	08/26/2013, 05/12/2015	FGRTO FGMMMM FGCAM
EUAMS02	A spray system used for applying cement to rubber parts for plastic overmolding. The system consists of an electrical preheater and two (2) topcoat application booths. Automated robot transfer of the parts from the preheat to the booths. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	12/08/2015	FGRTO FGMMMM FGCAM
EUADHESIVE1	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.	TBD	FGRTO FGMMMM FGCAM
EUADHESIVE2	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.	TBD	FGRTO FGMMMM FGCAM
EUADHESIVE3	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.	TBD	FGRTO FGMMMM FGCAM
EUADHESIVE4	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.	TBD	FGRTO FGMMMM FGCAM
EUBOILER2	Natural gas fired boiler for building heat; 26.0 MMBtu/hr	01/01/1956	FGDDDDD
EUBOILER4	Natural gas fired boiler for building heat; 12.55 MMBtu/hr	01/22/2018	FGDDDDD

EUCARBON EMISSION UNIT CONDITIONS

DESCRIPTION

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

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lbs. per 1,000 lbs. of exhaust gases, corrected to 50% excess air ²		EUCARBON	GC 13 SC VI.1, VI.2	R 336.1331(1)(a), Table 31, item J

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the equipment unless the baghouses are installed and operating properly. (R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall conduct and record quarterly maintenance checks of equipment. (R 336.1213(3))
- 2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUCARBON is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include

the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions. (R 336.1213(3))

3. The permittee shall monitor and record the pressure drop across the baghouses at least once per operating day. (R 336.1213(3))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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)

1. The permittee shall not operate EUCARBON unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor. (R 336.1213(3))

Footnotes:

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

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

EUMIX EMISSION UNIT CONDITIONS

DESCRIPTION

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

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Fabric filter (baghouse)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	1.44 pounds per hour ²	monthly average which is calculated using the actual operating hours for that month	EUMIX	GC 13 SC VI.1, VI.3	R 336.1331(1)(c)
2. Particulate	6.29 tons per year ²	based on a 12-month rolling time period as determined at the end of each calendar month	EUMIX	GC 13 SC VI.1, VI.3	R 336.1331(1)(c)
3. Particulate	0.01 pounds per 1,000 pounds of exhaust gases calculated on a dry gas basis ²	Hourly	EUMIX	GC 13 SC VI.1, VI.3	R 336.1331(1)(c)
4. Opacity	5% ²	6-minute average	EUMIX	SC VI.2	R 336.1301(c)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the equipment unless the baghouse is installed and operating properly.² (R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- 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
1. SV-PULSEJET	43 ²	33 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall not operate EUMIX unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor.² (R 336.1301, R 336.1331, R 336.1911)

Footnotes:

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

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

EUWHEEL EMISSION UNIT CONDITIONS

DESCRIPTION

Wheelabrator Tumblast (shot blast machine)

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Externally venting Wheelabrator baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 pound per 1,000 pounds of exhaust gases calculated on a dry gas basis ²	Hourly	EUWHEEL	GC 13 SC VI.1, VI.2	R 336.1331(1)(a), Table 31, item J

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the tumblast operation unless the baghouse is installed and operating properly.² (R 336.1910, R 336.1201)

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 conduct and record quarterly maintenance checks of equipment. (R 336.1213(3))
- The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUWHEEL is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions. (R 336.1213(3))

3. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the baghouse at least once per operating day. (R 336.1213(3))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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
1. SV-WHEEL	15 ²	26 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall not operate EUWHEEL unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor. (R 336.1213)

Footnotes:

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

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated
		Emission Unit IDs
FGRTO	An automated chain-on-edge spray line, four (4) Silver spray lines, and an overmolding spray system all used to coat metal and plastic parts. The VOC emissions from these six (6) lines are controlled by a common regenerative thermal oxidizer.	EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02 EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4
FGMMMM	Each affected source subject to 40 CFR Part 63, Subpart MMMM for the surface coating of miscellaneous metal parts and products.	EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02 EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4
FGCAM	40 CFR Part 64, Compliance Assurance Monitoring (CAM) requirements for the pollutant-specific emission unit (defined as FGRTO) that has potential pre-control emissions over 100 percent of the major source threshold.	EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02 EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4, (FGRTO)
FGDDDDD	Applicable requirements that would apply to affected boilers as described in 40 CFR Part 63, Subpart DDDDD.	EUBOILER2, EUBOILER4
FGRULE290	Rubber mixer controlled by externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.	EURUBBERMIX2
FGCOLDCLEANERS	Six small wash stations for cleaning parts.	EU002CLEAN

FGRTO FLEXIBLE GROUP CONDITIONS

DESCRIPTION

An automated chain-on-edge spray line, four (4) Silver spray lines, and an overmolding spray system all used to coat metal and plastic parts.

Emission Units: EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO), fabric filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	50.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGRTO	SC VI.2, VI.3	R 336.1205, R 336.1702(a), Paragraph 9.A.1 Consent Order AQD No. 25-2016
2. VOCs	23.6 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUADHESIVE2,	SC VI.2, SC VI.4	R 336.1205, R 336.1702(a)
3. Ethylbenzene	2.3 tpy ¹	12-month rolling time period as determined at the end of each calendar month		SC VI.6	R 336.1224, R 336.1225
4. Methyl isobutyl ketone	11.0 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUADHESIVE1, EUADHESIVE2,	SC VI.6	R 336.1224, R 336.1225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1702(a), Paragraph 9.A.1 Consent Order AQD No. 25-2016)

- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² (R 336.1224, R 336.1370, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² (R 336.1224, R 336.1702(a), Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- 4. The permittee shall not operate FGRTO unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d), Paragraph 9.A.1 Consent Order AQD No. 25-2016)

- The permittee shall maintain a facial velocity of 200 feet per minute though each natural draft opening of each PTE on a 3-hour block average basis.² (R 336.1702(a), R 336.1910, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f) for non-PTE enclosures.² (R 336.1702(a), R 336.1910, Paragraph 9.A.1 Consent Order AQD No. 25-2016)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate the spray booths in FGRTO unless all respective exhaust filters are installed and operating in a satisfactory manner.² (R 336.1224, R 336.1301, R 336.1910, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- 2. The permittee shall equip and maintain each spray booth in FGRTO with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² (R 336.1702(a), Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- The permittee shall not operate FGRTO unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC control efficiency (combined capture and destruction efficiencies) of 85 percent (by weight), maintaining a minimum temperature of 1,450°F, and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1,450°F based upon a 3-hour block average.² (R 336.1205, R 336.1225, R 336.1299, R 336.1702, R 336.1910, 40 CFR 64.6(c)(1)(i), Paragraph 9.A.1 Consent Order AQD No. 25-2016)

- 4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis during operation of any portion of FGRTO.² (R 336.1205, R 336.1225, R 336.1299, R 336.1702(a), R 336.1910, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- If the enclosure is a PTE, the permittee shall not operate EUSIL02, EUSIL03, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4 unless the respective PTE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following:² (R 336.1702(a), R 336.1910, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
 - a. The direction of the air flow at all times must be into the enclosure; and either
 - b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.
- 6. If the enclosure is not a PTE, the permittee shall not operate EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4 unless the respective enclosure is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following:² (R 336.1702(a), R 336.1910, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
 - a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and addon control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

V. TESTING/SAMPLING

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

- The permittee shall determine the VOC content, water content, and density of any adhesives and coatings, as applied and as received, randomly on a yearly basis with all coatings and adhesives tested within a five-year period using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5), Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- 2. By February 1, 2019 or an alternate date with prior approval of the AQD District Supervisor, the permittee shall determine the overall VOC control efficiency of FGRTO, the capture efficiency of the emission units in FGRTO (including EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4), and the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. Thereafter, the permittee must complete the testing once every five years from the most recent test. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (R 336.1205, R 336.1225, R 336.1702(a), R 336.1902, R 336.1910, R 336.2001, R 336.2003, R 336.2004, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- 3. At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down spray booth operations when the temperature of the regenerative thermal oxidizer drops below the minimum temperature requirement. Verification of the interlock system's operational integrity shall be conducted using methods, plans and procedures approved by the AQD prior to testing. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. (R 336.1213(3))

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1225, R 336.1299, R 336.1702, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each adhesive, coating, thinner, solvent, additive and catalyst, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.² (R 336.1225, R 336.1702, Paragraph 9.A.1 Consent Order AQD No. 25-2016)
- 3. The permittee shall keep the following information on a monthly basis for FGRTO:
 - a. Gallons (with water) of each adhesive, coating, thinner, solvent, additive and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive and catalyst used to coat plastic parts.
 - b. Where applicable, gallons (with water) of each material reclaimed.
 - c. VOC content (with water) of each material as applied.
 - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD District Supervisor.² (R 336.1205, R 336.1702(a), Paragraph 9.A.1 Consent Order AQD No. 25-2016)

- 4. The permittee shall keep the following information on a monthly basis for all adhesive coating lines:
 - a. Gallons (with water) of each ethylbenzene and methyl isobutyl ketone containing material used.
 - b. Where applicable, gallons (with water) of each ethylbenzene and methyl isobutyl ketone containing material reclaimed.
 - c. The ethylbenzene and methyl isobutyl ketone content (with water) in pounds per gallon of each material used.
 - d. Ethylbenzene and methyl isobutyl ketone mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e. Ethylbenzene and methyl isobutyl ketone 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. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1224, R 336.1225)

- The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the RTO on a continuous basis, during operation of FGRTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request.² (R 336.1205, R 336.1299, R 336.1702, Paragraph 9.A.1 Consent Order AQD No. 25-2016))
- 6. The permittee shall keep, in a satisfactory manner, operating temperature records for the RTO as required by SC IV.3. If the measured operating temperature of the RTO falls below 1,450°F during operation of FGRTO, the permittee may demonstrate compliance based upon a three-hour block average temperature, by calculating the average operating temperature for each three hour period which includes one or more temperature readings below 1,450°F. The permittee shall keep all records and calculations on file at the facility and make them available to the Department upon request.² (R 336.1205, R 336.1225, R 336.1299, R 336.1702, R 336.1910, 40 CFR Part 63, Subpart MMMM, Paragraph 9.A.1 Consent Order AQD No. 25-2016))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of each adhesive coating line (EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, and EUADHESIVE4).² (R 336.1201(7)(a))
- 5. The permittee shall notify the AQD District Supervisor, in writing, of the installation of the second adhesive line (EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4).¹ (R 336.1225)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTO	24 ²	38 ²	R 336.1225, 40 CFR 52.21(c) & (d), Paragraph 9.A.1 Consent Order AQD No. 25-2016

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall cease operation of EUSIL04 upon the installation of the second adhesive line (EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4). The permittee shall notify the District Supervisor upon the installation of the second adhesive line and the removal of EUSIL04.¹ (R 336.1225)
- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and MMMM as they apply to FGRTO.² (40 CFR Part 63, Subpart A and Subpart MMMM, Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- 3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP as they apply to FGRTO.² (40 CFR Part 63, Subpart A and Subpart PPPP)

Footnotes:

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

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

FGMMMM FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each affected source subject to 40 CFR Part 63, Subpart MMMM for the surface coating of miscellaneous metal parts and products.

Emission Units: EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	37.7 lbs per gal	12-month rolling	Existing –	SC V.1, VI.1	40 CFR
-	of coating solids ²	time period, as	Rubber-to-Metal	through VI.10	63.3890(b)(4),
	_	determined at the	Coating	-	Paragraph 9.B.1
		end of each	_		Consent Order AQD
		calendar month			No. 25-2016

- 2. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(a) through (c):
 - a. Compliant material option,
 - b. Emission rate without add-on controls option, or
 - c. Emission rate with add-on controls option.

The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials used when determining the emission rate.² (40 CFR 63.3891, Paragraph 9.B.1 Consent Order AQD No. 25-2016)

- Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the applicable emission limits at all times except during periods of startup, shutdown, and malfunction.² (40 CFR 63.3900(a)(2)(i), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- 4. If the permittee owns or operates an affected source that meets the applicability criteria of this subpart and at the same facility performs surface coating that meets the applicability criteria of any other final surface coating NESHAP in this part, the permittee may comply with a facility-specific emission limit. The procedures for calculating the facility-specific emission limit are specified in 40 CFR 63.3890(c)(2). If the facility-specific emission limit is used, then the permittee must include coating activities that meet the applicability criteria of the other subcategories that constitute more than 1% of the total coating activities. Compliance with the facility-specific emission limit and the emission limitations for all surface coating operations can be used for compliance with this and other applicable surface coating NESHAP.² (40 CFR 63.3881(e), 40 CFR 63.3890(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

For any coating operation(s) using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart MMMM as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3967. (40 CFR 63.3892(b) and Table 1, Paragraph 9.B.1 Consent Order AQD No. 25-2016)

Add-on Control Device	Operating Limit	
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).	
Emission capture system that	a. The direction of the air flow at all times must be into the enclosure; and	
is a PTE according to 40 CFR 63.3965(a).	b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.	
Emission capture system that is not a PTE according to 40 CFR 63.3965(a).	a. The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device according to 40 CFR 63.3967(f).	

- 2. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall develop and implement a work practice plan, to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The work practice plan shall specifiy practices and procedures to ensure at a minimum the following elements are implemented:
 - All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.² (40 CFR 63.3893(b)(1), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.² (40 CFR 63.3893(b)(2), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.² (40 CFR 63.3893(b)(3), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.² (40 CFR 63.3893(b)(4), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.² (40 CFR 63.3893(b)(5), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - f. The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g).² (40 CFR 63.3893(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g).² (40 CFR 63.3893(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

3. If the affected source uses an emission capture system and add-on control device, the permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The SSMP must also address any

coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.² (40 CFR 63.3900(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

- 4. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction.² (40 CFR 63.3900(a)(2)(ii), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the work practice standards in 40 CFR 63.3893 at all times.² (40 CFR 63.3900(a)(2)(iii), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall not operate FGMMMM unless the RTO is installed, maintained, and operated in a satisfactory manner.² (40 CFR 63.3892(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.3931)

- 1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall conduct each performance test required by 40 CFR 63.3960 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.3964(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h).² (40 CFR 63.3964(a), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- The permittee shall conduct each performance test of an emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.3965 and 40 CFR 63.3966.² (40 CFR 63.3964(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.3931)

- The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months.² (40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960, Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931.² (40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- 3. The permittee shall maintain, at a minimum, the following records for each compliance period:
 - A copy of each notification and report that is submitted to comply with Subpart MMMM, and the documentation supporting each notification and report.² (40 CFR 63.3930(a), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating.² (40 CFR 63.3930(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

- c. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used.² (40 CFR 63.3930(c)(1), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- d. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.3930(c)(4)(i) through (v).² (40 CFR 63.3930(c)(4), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- e. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the volume used.² (40 CFR 63.3930(d), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- f. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight.² (40 CFR 63.3930(e), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- g. The volume fraction of coating solids for each coating used during each compliance period.² (40 CFR 63.3930(f), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- h. For the emission rate with add-on controls option, the density of each coating, thinner and/or other additive, and cleaning material used during each compliance period. (40 CFR 63.3930(g), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4).² (40 CFR 63.3930(h), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- j. The date, time, and duration of each deviation.² (40 CFR 63.3930(j), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- k. For the emission rate with add-on controls option, records specified in 40 CFR 63.3930(k)(1) through 40 CFR 63.3930(k)(8).² (40 CFR 63.3930(k), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 of 40 CFR Part 63, Subpart MMMM using the applicable method(s) described below:² (40 CFR 63.3963(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Thermal oxidizer	 a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a). 	 i. Collect the combustion temperature data according to 40 CFR 63.3968(c); ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
system that is a PTE according to	 a. The direction of the air flow at all times must be into the enclosure; and b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute. 	 i. Collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.3968(g)(1); and ii. Maintain the facial velocity of air flow through all natural draft openings at or above the facial velocity limit and maintain the direction of air flow into the enclosure at all times.

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
system that is not a PTE according to	a. The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device according to 40 CFR 63.3967(f).	
40 CFR 63.3965(a).		ii. Reduce the data to 3-hour block averages; and
		iii. Maintain the 3-hour average gas volumetric flow rate for each capture device at or above the gas volumetric flow rate.

- 5. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to the procedures in 40 CFR 63.3961.² (40 CFR 63.3963, Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- During the performance test required by 40 CFR 63.3960, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.3967 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.3892.² (40 CFR 63.3967, Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- For any coating operation(s) using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.3968(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.3968(b).² (40 CFR 63.3968, Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- The permittee must apply to the USEPA for approval of alternative monitoring under 40 CFR 63.8(f), if using an add-on control device other than those listed in Table 1 of 40 CFR Part 63, Subpart MMMM, or to monitor an alternative parameter and comply with a different operating limit.² (40 CFR 63.3892(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7):
 - a. The organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890.² (40 CFR 63.3963(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - b. An operating parameter is out of the allowed range.² (40 CFR 63.3963(c)(1), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened.² (40 CFR 63.3963(d), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
 - d. Deviations from work practice standards occur.² (40 CFR 63.3963(e), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

- The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910.² (40 CFR Part 63, Subparts A and MMMM, Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance.² (40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- For any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for emission capture systems and add-on control devices.² (40 CFR 63.3920(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
- If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit an SSM report as specified in 40 CFR 63.3920(c).² (40 CFR 63.3920(c), 40 CFR 63.10(d), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

 The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products.² (40 CFR Part 63, Subparts A and MMMM, Paragraph 9.B.1 Consent Order AQD No. 25-2016)

Footnotes:

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

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

FGCAM FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 64, Compliance Assurance Monitoring (CAM) requirements for the pollutant-specific emission unit (defined as FGRTO) that has potential pre-control emissions over 100 percent of the major source threshold.

Emission Units: EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4, (FGRTO)

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis during operation of any portion of FGRTO. (40 CFR 64.6(c)(1)(i) and (ii))

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 continuously monitor combustion chamber temperature and record the combustion temperature data per FGRTO, SC VI.6 and VI.7. The average combustion temperature in any 3-hour period must not fall below the indicator combustion temperature identified in Appendix 3. (40 CFR 64.6(c)(1)(i) and (ii))
- 2. The permittee shall verify the accuracy of chamber thermocouples on a monthly basis. (40 CFR 64.6(c)(1)(iii))
- 3. The permittee shall continuously monitor the air flow to the RTO using the CPMS. The air flow to the RTO shall not fall outside the indicator range identified in Appendix 3. (40 CFR 64.6(c)(1)(i) and (ii))
- The permittee shall verify the capture system for a non-PTE (EUSIL01) by monitoring the average gas volumetric flow rate in the duct between the capture device and the add-on control device inlet in accordance with 40 CFR 63.3965(a). The average volumetric flow rate shall not fall below the indicator range identified in Appendix 3. (40 CFR 64.3(a)(2))

- 5. The permittee shall monitor the capture system that is a PTE by determining the average facial velocity of air through all natural draft openings in the enclosure in accordance with 40 CFR 63.3968(g)(1). The average facial velocity shall be determined by monitoring the booth exhaust airflow (in cfm) and ensuring that the airflow does not fall below the following indicator ranges identified in Appendix 3: (40 CFR 64.3(a)(2))
- 6. The permittee shall verify the accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage on a monthly basis. (40 CFR 64.6(c)(1)(iii))
- 7. The permittee shall evaluate the capture system that is a PTE by continuously monitoring the pressure of airflow to determine the direction of airflow into the enclosure. The pressure shall be continuously monitored on the CPMS and shall be negative. **(40 CFR 64.3(a)(2))**
- 8. An excursion is a departure from the indicator ranges identified in Appendix 3. (40 CFR 64.6(c)(2))
- 9. Upon detecting an excursion or exceedance, the owner or operator shall immediately cease operation of FGRTO and shall restore normal operation of FGRTO (including the control device and associated capture system) as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions prior to restarting operations. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). See Appendix 3 for the corrective action plan. (40 CFR 64.7(d))
- 10. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 11. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))
- 12. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. (40 CFR 64.9(b)(1))
- 13. The permittee shall determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation. (40 CFR 64.3(a)(2))

See Appendix 3

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. (40 CFR 64.9(a)(2)(i))
- 5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**
- 6. Each semiannual report of monitoring and deviations shall include a description of the actions taken to implement a QIP during the reporting period (if appropriate). If a QIP has been completed, the report shall include documentation that the plan has been implemented and if it has reduced the likelihood of excursions or exceedances. (40 CFR 64.9(a)(2)(iii))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENTS

- 1. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)
- 2. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))
- 3. The permittee shall submit a QIP if 6 excursions occur in any 3-month period. (40 CFR 64.8(a))

Footnotes:

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

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

FGDDDDD FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for existing Gas 1, (Natural Gas only) for new and existing Boilers and Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These boilers or process heaters must comply with this subpart except as provided in 40 CFR 63.6(i).

Emission Units: EUBOILER2, EUBOILER4

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

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

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler or process heater at the source. (40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)
- 2. The permittee must operate and maintain affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, r
- 3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. (40 CFR 63.7500(b))
- 4. The permittee must:
 - a. Complete a tune-up every 5 years (61 months) for boilers/process heaters less than or equal to 5 million Btu per hour. (40 CFR 63.7500(e), 40 CFR 63.7515(d))
 - b. Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. (40 CFR 63.7500(e), 40 CFR 63.7515(d))
 - c. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. (40 CFR 63.7540(a)(10), 40 CFR 63.7515(d))

- d. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. (40 CFR 63.7540(a)(13))
- e. Follow the procedures described in SC IX 4.a through SC IX 4.f for all initial and subsequent tune ups. (40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)
- f. Complete the Initial tune ups on all affected units no later than January 31, 2016, except as provided in 40 CFR 63.7510(j) and 40 CFR 63.7540(a)(13).
- 5. For EU-BOILER2, the permittee must complete the one-time energy assessment no later than January 31, 2016. (40 CFR 63.7510(e))
- 6. For EU-BOILER4, the permittee must complete the one-time energy assessment no later than 180 days after startup. (40 CFR 63.7510(e))
- For affected sources, as defined in 40 CFR 63.7490, that switch subcategory consistent with 40 CFR 63.7545(h) after the initial compliance date, you must demonstrate compliance within 60 days of the effective date of the switch, unless you had previously conducted your compliance demonstration for this subcategory within the previous 12 months. (40 CFR 63.7510(k))

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))

- The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.7555(a)(1))
- The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. (40 CFR 63.7560(a), (b), and (c))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60th day following the completion of the initial compliance demonstrations for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following

information and must be submitted within 60 days of the compliance date specified at 40 CFR 63.7495(b). (40 CFR 63.7545(e))

- a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. **(40 CFR 63.7545(e)(1))**
- b. Certification(s) of compliance, as applicable, and signed by a responsible official: (40 CFR 63.7545(e)(8))
 - i. "This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR 63 Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi)." (40 CFR 63.7545(e)(8)(i))
 - ii. "This facility has had an energy assessment performed according to 40 CFR 63.7530(e)." (40 CFR 63.7545(e)(8)(ii))
- 5. The permittee must submit boiler tune-up compliance reports. The first compliance report shall cover the period January through December of the year in which the tune up was completed and must be postmarked or submitted no later than March 15th of the reporting year that immediately follows the year in which the tune-up was completed. If submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495 and ending on December 31 within 1, 2, or 5 years, as applicable, after the compliance date that is specified for your source in 40 CFR 63.7495. Each subsequent semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. Each subsequent semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than March 15. Compliance reports must be submitted using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to the Air Quality Division and EPA Region 5. At the discretion of the Administrator, the permittee must submit these reports, in the format specified by the Administrator. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. (40 CFR 63.7550(b), 40 CFR 63.10(a)(5), 40 CFR 63.7550(h)(3))
- 6. For each affected source that is subject to permitting regulations pursuant to Part 70 or Part 71 of this chapter, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established in the permit instead of according to the dates in paragraphs (b)(1) through (4) of this section. (40 CFR 63.7550(b)(5))
- 7. The permittee must include the following information in the compliance report. (40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))
 - a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
 - b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
 - c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
 - Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
 - e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

IX. OTHER REQUIREMENT(S)

- 1. The permittee must comply with applicable provisions of 40 CFR Part 63, Subpart DDDDD. (40 CFR 63.7495(b))
- 2. The permittee must be in compliance with the applicable work practice standards. (40 CFR 63.7505(a))
- 3. For affected sources (as defined in 40 CFR 63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. (40 CFR 63.7515(g))
- 4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: (40 CFR 63.7540(a))
 - a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.7540(a)(10)(iii))
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv))
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.7540(a)(10)(v))
 - f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below. (40 CFR 63.7540(a)(10)(vi))
 - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. (40 CFR 63.7540(a)(10)(vi)(A))
 - ii. A description of any corrective actions taken as a part of the tune-up. (40 CFR 63.7540(a)(10)(vi)(B))
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. (40 CFR 63.7540(a)(10)(vi)(C))
- 5. If the boiler or process heater has a heat input capacity of less than or equal to 5 million Btu per hour, the permittee may delay the burner inspection specified in SC IX 4.a until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. (40 CFR 63.7540(a)(12))

Footnotes:

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

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

FGRULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units installed prior to December 20, 2016: EURUBBERMIX2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

- Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. (R 336.1290(2)(a)(i))
- 2. Any emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(2)(a)(ii))
 - a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.
 (R 336.1290(2)(a)(ii)(A))
 - b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(2)(a)(ii)(B))
 - c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (R 336.1290(2)(a)(ii)(C))
 - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed <u>on or after</u> December 20, 2016.
 (R 336.1290(2)(a)(ii)(D))
 - e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed <u>on or after</u> December 20, 2016. (R 336.1290(2)(a)(ii)(E))
- Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: (R 336.1290(2)(a)(iii))

- a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**
- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. (R 336.1290(2)(a)(iii)(B))
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(2)(a)(iii)(C))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. (R 336.1213(3))
 - a. Records identifying each air contaminant that is emitted. (R 336.1213(3))
 - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))

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

See Appendix 4

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Six small wash stations for cleaning parts.

Emission Unit: EU002CLEAN

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

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. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 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))
- 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

ROP No: MI-ROP-E5094-2018 Expiration Date: October 21, 2023 PTI No: MI-PTI-E5094-2018

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

ROP No: MI-ROP-E5094-2018 Expiration Date: October 21, 2023 PTI No: MI-PTI-E5094-2018

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 ₂ e	Carbon Dioxide Equivalent		
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot		
СОМ	Continuous Opacity Monitoring	dscm	Dry standard cubic meter		
Department/	Michigan Department of Environmental	°F	Degrees Fahrenheit		
department	Quality	gr	Grains		
EU	Emission Unit	HAP	Hazardous Air Pollutant		
FG	Flexible Group	Hg	Mercury		
GACS	Gallons of Applied Coating Solids	hr	Hour		
GC	General Condition	HP	Horsepower		
GHGs	Greenhouse Gases	H ₂ S	Hydrogen Sulfide		
HVLP	High Volume Low Pressure*	kW	Kilowatt		
ID	Identification	lb	Pound		
IRSL	Initial Risk Screening Level	m	Meter		
ITSL	Initial Threshold Screening Level	mg	Milligram		
LAER	Lowest Achievable Emission Rate	mm	Millimeter		
MACT	Maximum Achievable Control Technology	MM	Million		
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts		
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds		
MDEQ	Michigan Department of Environmental	NOx	Oxides of Nitrogen		
	Quality	ng	Nanogram		
MSDS	Material Safety Data Sheet	РM	Particulate Matter		
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10		
NAAQS	National Ambient Air Quality Standards		microns in diameter		
NESHAP	National Emission Standard for Hazardous 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	psia	Pounds per square inch absolute		
PTI	Permit to Install	psig	Pounds per square inch gauge		
RACT	Reasonable Available Control Technology	scf	Standard cubic feet		
ROP	Renewable Operating Permit	sec	Seconds		
SC	Special Condition	SO ₂	Sulfur Dioxide		
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant		
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature		
SRN	State Registration Number	THC	Total Hydrocarbons		
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year		
USEPA/EPA	United States Environmental Protection	μg	Microgram		
	Agency	μm	Microgram Micrometer or Micron		
VE	Visible Emissions	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 FGCAM. The following indicator operating ranges, or alternate values as established through testing, shall be used to satisfy monitoring in FGCAM. Any changes to the values below shall be updated in the source's Malfunction Abatement Plan.

Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
RTO	Temperature	Minimum 1577°F (3-hour block average)	Continuous	Do not operate the coating processes unless the RTO is within the proper operating range. In the event of an RTO system fault, the system will shut down and sound an alarm. If the RTO faults and shuts down, all coating operations must be stopped as quickly as possible. The fault should be examined to determine the cause of the out of range reading and a repair determined. After the problem has been fixed, the RTO system must be restarted as per the SSMP to return the unit to operation before coating operations can resume.
Non-PeTE for EUSIL01	Stack CFM	CFM greater than 2,369 (3- hour block average)	Continuous	Do not operate the coating process required to be inside the non- permanent total enclosure unless the exhaust CFM is above the operating limit noted. If the CFM minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL02	Airflow direction Face Velocity	Toward RTO (into booth) CFM greater than 236 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless the face velocity is above the operating limit noted. If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL03	Airflow direction Stack CFM	Toward RTO (into booth) CFM greater than 554 (equivalent to 200 FPM at NDO's) (3- hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL04	Airflow direction Stack CFM	Toward RTO (into booth) CFM greater than 502	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating

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		(equivalent to		method (i.e. streamer) or with handheld differential meter. If the direction
		200 FPM at NDO's (3-hour block		of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.
		average)		In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUCOE01			Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
	Stack CFM	CFM greater than 296 (equivalent to 200 FPM at NDO's) (3- hour block average)		If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUAMS02	Airflow direction	Toward RTO (into booth)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
	Stack CFM	CFM greater than 6 (equivalent to 200 FPM at NDO's) (3- hour block average)		If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.
				Abatement Contingency Plan.

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-E5094-2012. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-E5094-2012c is being reissued as Source-Wide PTI No. MI-PTI-E5094-2018.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
49-18	201800080	Addition of four new adhesive coating lines	FGRTO
183-16	201700036	Replace the rubber mixer.	EUMIX
54-06B	201500083	New plastic parts coating line to existing metal parts coating lines.	FGRTO
54-06A	201300197	New chain on edge machine to apply adhesives.	FGRTO

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

B. Other Reporting

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