20230064 Received EGLE/AQD

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

EGLE

RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

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

GENERAL INSTRUCTIONS

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

PART A: GENERAL INFORMATION

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

SOURCE INF	FORMATION					100
SRN	SIC Code	NAICS Code	е	Existing ROP Number		Section Number (if applicable)
N0544	3088	326191		MI-ROP-N0544-2019		
Source Name Warm Rain C	orporation					
Street Address 51675 Indust	rial Dr.					
City		s	State	ZIP Code	County	
Calumet		V	ΛI	49913	Houghton	ε ·
Section/Town/Ra	ange (if address not a	vailable)		·		
Source Descripti	on	යි				
	arked-up copy of			fferent than what a	opears in the existii	ng ROP. Identify any changes
Owner Name	ORMATION			Š		Section Number (if applicable)
Theodore Kro	onschnabel					
Mailing address	(⊠ check if same as	source address)				
City			State	ZIP Code	County	Country
Calumet			MI	49913	Houghton	USA
	here if any informed on an Addition				confidential. Conf	idential information should be

SRN: N0544	Section Number (if applicable):

PART A: GENERAL INFORMATION (continued)
At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION						
Contact 1 Name			Title			
Zach Merrill			Operation Specialist			
Company Name & Mailing address (check if same as source address)						
City	State	ZIP Code		County	Country	
Phone number 906-482-3750			E-mail address merrill@warmrain.com			
Contact 2 Name (optional) James Benson			Title Assistan	t General Manager		
Company Name & Mailing address (⊠ check	if same as sour	ce address				
City	State	ZIP Code	е	County	Country	
Phone number		E-mail ad	ddress			
906-482-3750		jbenso	n@warmr	ain.com		
RESPONSIBLE OFFICIAL INFORM	ATION					
Responsible Official 1 Name			Title			
Zach Merrill			Operatio	n Specialist		
Company Name & Mailing address (⊠ check	if same as sour	ce address	3)			
City	State	ZIP Code	e	County	Country	
Phone number		E-mail a	ddress			
S DO DAY ON BE MINISTERNAL CONTROL OF THE SECOND CONTROL OF THE SE			zmerrill@warmrain.com			
			1			
Responsible Official 2 Name (optional)			Title			
Company Name & Mailing address (☐ check	Company Name & Mailing address (check if same as source address)					
City	State	ZIP Code	Э	County	Country	
Phone number		E-mail ad	ddress		•	
☐ Check here if an Al-001 Form is	attached to	provide	more info	rmation for Part A. Ente	Al-001 Form ID:	

SRN: N0544	Section Number (if applicable):

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

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

Listing of ROP Application Contents. Check the box f	or the items included with your application.			
Completed ROP Renewal Application Form (and any Al-001 Forms) (required)	Compliance Plan/Schedule of Compliance			
Mark-up copy of existing ROP using official version from the AQD website (required)	Stack information			
Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	Acid Rain Permit Initial/Renewal Application			
Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	Cross-State Air Pollution Rule (CSAPR) Information			
MAERS Forms (to report emissions not previously submitted)	Confidential Information			
Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	Paper copy of all documentation provided (required)			
Compliance Assurance Monitoring (CAM) Plan	☐ Electronic documents provided (optional)			
Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	Other, explain:			
Compliance Statement				
This source is in compliance with <u>all</u> of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.				
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.				
This source will meet in a timely manner applicable requirements that become effective during the permit term. ☐ Yes ☐ No				
The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.				
If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.				
Name and Title of the Responsible Official (Print or Type)				
Zach Merrill Operation Specialist				
As a Responsible Official, I certify that, based on in the statements and information in this application a	formation and belief formed after reasonable inquiry, are true, accurate, and complete.			
1/3 7	3-23-23			
Signature of Responsible Official	Signature of Responsible Official Date			

For Assistance Contact: 800-662-9278

PART C: SOURCE REQUIREMENT INFORMATION

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

C1.	Actual emissions and associated data from <u>all</u> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <u>not</u> been reported in MAERS for the most recent emissions reporting year? If <u>Yes</u> , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes	⊠ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	Yes	⊠ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68)	☐ Yes	⊠ No
	If <u>Yes</u> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	Yes	⊠ No
C4.	Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO ₂ , VOC, lead) emissions?	☐ Yes	⊠ No
	If <u>Yes</u> , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If <u>No</u> , criteria pollutant potential emission calculations do not need to be included.		
C5.	Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act?	☐ Yes	⊠ No
	If <u>Yes</u> , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <u>must</u> be included in HAP emission calculations. If <u>No</u> , HAP potential emission calculations do not need to be included.		
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <u>Yes</u> , identify the specific emission unit(s) subject to CSAPR on an Al-001 Form.	☐ Yes	⊠ No
C7.	Are any emission units subject to the federal Acid Rain Program? If <u>Yes</u> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an Al-001 Form.	Yes	⊠ No
	Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes	⊠ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <u>Yes</u> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy.	Yes	⊠ No
	Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	☐ Yes	⊠ No
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement?	☐ Yes	⊠ No
	If <u>Yes</u> , then a copy must be submitted as part of the ROP renewal application.		
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable?	Yes	⊠ No
	If <u>Yes</u> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an Al-001 Form.	an ID: A1	
	Check here if an Al-001 Form is attached to provide more information for Part C. Enter Al-001 Form	TID: AI	•

SRN: N0544	Section Number (if applicable):

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below.				
If <u>No</u> , go to Part E. Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).				
Emission Unit ID	Emission Unit Description	Rule 212(4) Citation [e.g. Rule 212(4)(c)]	Rule 201 Exemption Rule Citation [e.g. Rule 282(2)(b)(i)]	
	,			
Comments:				
<i>y</i>				
☐ Check here if an Al-001 Form is attached to provide more information for Part D. Enter Al-001 Form ID: Al-				

PART E: EXISTING ROP INFORMATION

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

E1.	Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP?	☐ Yes	⊠ No
	If <u>Yes</u> , identify changes and additions on Part F, Part G and/or Part H.		
E2.	For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u> , identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes	⊠ No
E3.	Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI?	☐ Yes	⊠ No
	If <u>Yes</u> , complete Part F with the appropriate information.		
E4.	Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u> , identify the emission unit(s) and the dismantle date in the comment area below or on an Al-001 Form.	☐ Yes	⊠ No
Coı	mments:		
	Check here if an Al-001 Form is attached to provide more information for Part E. Enter Al-001 Form	orm ID: Al-	•

SRN: N0544	Section Number (if applicable):

PART F: PERMIT TO INSTALL (PTI) INFORMATION
Review all emission units and applicable requirements at the source and answer the following questions as they pertain to all emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If <u>Yes</u> , complete the following table. If <u>No</u> , go to Part G.				s 🛭 No
Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Em Unit was Modified Reconst	s Installed/ d/
emission unit affected in the	ts in the existing ROI	ange, add, or delete terms/conditions to established P? If <u>Yes</u> , identify the emission unit(s) or flexible group(s) ow or on an AI-001 Form and identify all changes, additions, xisting ROP.	☐ Yes	⊠ No
the ROP? If Y	<u>'es,</u> submit the PTIs	entify new emission units that need to be incorporated into as part of the ROP renewal application on an Al-001 Form, s) or flexible group(s) in the mark-up of the existing ROP.	☐ Yes	⊠ No
listed above th	at were <u>not</u> reported	e requirements for emission unit(s) identified in the PTIs in MAERS for the most recent emissions reporting year? If not reported on the applicable MAERS form(s).	☐ Yes	⊠ No
or control devi	ces in the PTIs listed	tive changes to any of the emission unit names, descriptions I above for any emission units not already incorporated into nges on an AI-001 Form.	☐ Yes	⊠ No
Comments:				,
☐ Check here if	f an Al-001 Form is a	ttached to provide more information for Part F. Enter Al-001 F	Form ID:	AI-

SRN: N0544	Section Number (if applicable):

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

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

	ny new and/or existing emission units which do <u>not</u> already appear in nich meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.			
If Yes, identify the emiss	ion units in the table below. If <u>No,</u> go to Part H.	☐ Yes ⊠ No		
Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.				
Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed		
Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation				
Rule 287(2)(c) surface coating line				
Rule 290 process with limited emissions				
Comments:				
☐ Check here if an Al-001	Form is attached to provide more information for Part G. Enter Al-001 F	Form ID: AI-		

SRN: N0544	Section Number (if applicable):
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PART H: REQUIREMENTS FOR ADDITION OR CHANGE

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

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

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

SRN: N0544	Section Number (if applicable):

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

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

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SRN: N0544	Section Number (if applicable):
	100 5000000

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

H15. Does the source propose to add, change and/or delete stack/vent restrictions ? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	Yes	⊠ No
H16. Does the source propose to add, change and/or delete any other requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	Yes	⊠ No
H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If <u>Yes</u> , identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes	⊠ No
Check here if an Al-001 Form is attached to provide more information for Part H. Enter Al-001 Form	rm ID: Al-	

EGLE

RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

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

	SRN:	Section Number (if applicable):	
Additional Information ID Al-			
Additional Information			
2. Is This Information Confidential?		☐ Yes ☐ No	
		Page	of

For Assistance Contact: 800-662-9278

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

EFFECTIVE DATE: July 18, 2019

ISSUED TO

WarmRain Corporation

State Registration Number (SRN): N0544

LOCATED AT

51675 North Industrial Drive, Calumet, Houghton County, Michigan 49913

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N0544-2019

Expiration Date: July 18, 2024

Administratively Complete ROP Renewal Application Due Between January 18, 2023 and January 18, 2024

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N0544-2019

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

Michigan Department of Environment, Great Lakes, and Energy

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))

- 7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

Equipment & Design

- 9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).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:"

 (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. (R 336.1901(b))

Testing/Sampling

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

Monitoring/Recordkeeping

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

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

Certification & Reporting

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- 21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (R 336.1213(3)(c))
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**

- a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete." The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
- 23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. (R 336.1213(3)(c)(i))
- 24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. (R 336.1212(6))
- 25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² (R 336.1912)

Permit Shield

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

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

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

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (R 336.1201(1))

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBOOTH1	Dry filter spray booth for open molding gelcoat application.	1976	FGBOOTHS FGMACTWWWW
EUBOOTH2	Dry filter spray booth for open molding fiberglass lay-up.	1976	FGBOOTHS FGMACTWWWW
EUBOOTH3	Dry filter spray booth for open molding fiberglass lay-up.	1976	FGBOOTHS FGMACTWWWW
EUBOOTH4	Dry filter spray booth for open molding fiberglass lay-up.	1976	FGBOOTHS FGMACTWWWW
EUCLEANUP	Acetone and other solvents used throughout the facility for cleaning purposes.	1976	FGMACTWWWW

EUCLEANUP EMISSION UNIT CONDITIONS

DESCRIPTION

Acetone and other solvents used throughout the facility for cleaning purposes.

Flexible Group ID: FGMACTWWWW

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. <u>TESTING/SAMPLING</u>

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. All records shall be completed and made available by the 15th day of each calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1213(3))**
- 2. The permittee shall keep records of the following information on a monthly basis for EUCLEANUP:
 - a. The identity of each clean-up solvent used,
 - b. The amount (in gallons or pounds) of each clean-up solvent used,
 - c. Where applicable, gallons or pounds of each clean-up solvent reclaimed.

The records shall be kept in a format acceptable to the AQD District Supervisor. (R 336.1213(3))

See Appendix 4

VII. REPORTING

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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 SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBOOTHS	Four dry filter spray booths for gelcoat and fiberglass operations.	EUBOOTH1 EUBOOTH2
		EUBOOTH3 EUBOOTH4
FGMACTWWWW	All processes subject to 40 CFR Part 63, Subpart WWWW – National Emissions Standard for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Applicable processes include open molding, mixing, cleaning, material storage, and repairing parts manufactured.	EUBOOTH1 EUBOOTH2 EUBOOTH3 EUBOOTH4 EUCLEANUP

FGBOOTHS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Four dry filter spray booths for gelcoat and fiberglass operations.

Emission Units: EUBOOTH1, EUBOOTH2, EUBOOTH3, EUBOOTH4

POLLUTION CONTROL EQUIPMENT

Dry exhaust filters

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate FGBOOTHS unless all dry filters are properly installed, maintained, and operated in a satisfactory manner.² (R 336.1201, R 336.1213(2), R 336.1910)
- 2. The permittee shall change the dry filters in FGBOOTHS when an inspection concludes that inadequate capture efficiency is taking place. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall inspect FGBOOTHS on a daily basis to determine whether all filters are in place as required. (R 336.1213(3))
- 2. The permittee shall maintain a daily record on the condition of the exhaust filters contained in FGBOOTHS using the following format:
 - a. Date and time,
 - b. Inspector,
 - c. Booth number,
 - d. Are all filters in place (Y/N),
 - e. Are spare filters available (Y/N),
 - f. Corrective actions / comments.

The permittee shall compile these records into reports covering a 6-month reporting period. The records shall be kept in a format acceptable to the AQD District Supervisor. (R 336.1213(3))

- 3. The permittee shall keep the following information each calendar month for FGBOOTHS:
 - a. The identity of each resin, gel coat, and catalyst used,
 - b. The amount (in gallons or pounds) of each resin, gel coat, and catalyst used,
 - c. The VOC and HAP (styrene, methyl methacrylate, and any other HAP) content in weight percent of each resin, gel coat, and catalyst used.

The records shall be kept in a format acceptable to the AQD District Supervisor. (R 336.1213(3))

See Appendix 3

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

FGMACTWWWW FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All processes subject to 40 CFR Part 63, Subpart WWWW – National Emissions Standard for Hazardous Air Pollutants: Reinforced Plastic Composites Production. Applicable processes include open molding, mixing, cleaning, material storage, and repairing parts manufactured.

Emission Units: EUBOOTH1, EUBOOTH2, EUBOOTH3, EUBOOTH4, EUCLEANUP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP ¹	88 lb/ton resin	Dependent upon compliance method ²	Open Molding- Mechanical Resin Application (Non- Corrosion Resistant and/or Non-High Strength Resin)	SC VI.5	40 CFR 63.5805(b)
2. Organic HAP ¹	267 lb/ton gel	Dependent upon compliance method ²	Open Molding- Gel Coat (White/Off White Pigmented Gel Coat)	SC VI.5	40 CFR 63.5805(b)
3. Organic HAP¹	377 lb/ton gel	Dependent upon compliance method ²	Open Molding- Gel Coat (Other Pigmented Gel Coat)	SC VI.5	40 CFR 63.5805(b)

¹ Organic HAP includes styrene and methyl methacrylate (MMA).

- a. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit.
- b. Demonstrate that, on average, they meet the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type.
- c. Demonstrate compliance with a weighted average emission limit.
- d. Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGMACTWWWW except in compliance with the applicable work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, as well as the organic HAP emission limits in Table 3 or the organic HAP content limit in Table 7. (40 CFR 63.5805(b), 40 CFR 63.5835(a))

² The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits using one of the following methods:

2. The permittee shall not use cleaning solvents that contain any HAP except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts the resin. (40 CFR 63.5805(b))

- 3. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing material storage tanks may be vented as necessary for safety. (40 CFR 63.5805(b))
- 4. The permittee shall use covers on mixing containers with no visible gaps and keep mixer covers closed during mixing operations, except when adding materials or changing covers to the mixing containers. (40 CFR 63.5805(b))

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

NA

V. TESTING/SAMPLING

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

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 a current listing from the manufacturer of the chemical composition of each material (i.e. resin, gel coat, catalyst, clean-up solvent, etc.). The data shall consist of information provided by the material manufacturer and must be adequate for determining the HAP content of each material as specified in 40 CFR 63.5797. (40 CFR 63.5797)
- 2. The permittee shall determine compliance with the applicable emission limits in the FGMACTWWWW Emission Limit Table and in Table 3 of 40 CFR Part 63, Subpart WWWW by using one of the following methods: (40 CFR 63.5810)
 - a. In accordance with 40 CFR 63.5810(a), demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit,
 - b. In accordance with 40 CFR 63.5810(b), demonstrate that, on average, the permittee meets the individual organic HAP emissions limits for each combination of operation type and resin application method or gel coat type,
 - c. In accordance with 40 CFR 63.5810(c), demonstrate compliance with a weighted average emission limit,
 - d. In accordance with 40 CFR 63.5810(d), meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type.
- 3. The emission factors from Table 1 of 40 CFR Part 63, Subpart WWWW shall be used to calculate organic HAP emissions for the purposes of compliance demonstration. (40 CFR 63.5805(b), 40 CFR 63.5810, 40 CFR 63.5796)
- 4. The permittee must comply with the recordkeeping requirements as detailed in 40 CFR 63.5895 and 63.5900. (40 CFR 63.5895, 40 CFR 63.5900)

See Appendix 7

VII. REPORTING

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

- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Semiannual Compliance Reporting pursuant to 40 CFR Part 63, Subpart WWWW. Report shall be postmarked or received by March 15 for reporting period July 1 through December 31 and by September 15 for reporting period January 1 through June 30. **(40 CFR 63.5910)**
- 5. The permittee shall submit semiannual compliance reports according to the procedures specified in Table 14 of 40 CFR Part 63, Subpart WWWW, to the Department in accordance with 40 CFR 63.5910. (40 CFR 63.5910)
- 6. The permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) and Table 13 of 40 CFR Part 63, Subpart WWWW. This report shall include certification of work practice standards. (40 CFR 63.5905(a), 40 CFR 63.5860(a), 40 CFR 63.9(h))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW. (40 CFR Part 63, Subpart WWWW)

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).

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

ACD	Appendix I.	Common Acronyms		Pollutant / Measurement Abbreviations
BACT Best Available Control Technology BTU British Thermal Unit CAA Clean Air Act C Degrees Celsius CAM Compliance Assurance Monitoring CO Carbon Monoxide CEMS Continuous Emission Monitoring COe Carbon Dioxide Equivalent CFR Code of Federal Regulations dscf dscf COM Continuous Opacity Monitoring dscf dscf dscf COM Continuous Opacity Monitoring dscf dscf <th>AOD</th> <th></th> <th></th> <th></th>	AOD			
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NESHAP National Emission Standard for Hazardous Air Pollutants NSPS New Source Performance Standards NSR New Source Review PS Performance Specification PSD Prevention of Significant Deterioration PTE Permanent Total Enclosure PTI Permit to Install RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA New Source Performance Standards ppm Parts per million Parts per million by volume Parts per million by volume Parts per million by volume Parts per million Parts p	NAAQS	• •	PM2.5	
Air Pollutants NSPS New Source Performance Standards NSR New Source Review PS Performance Specification PSD Prevention of Significant Deterioration PTE Permanent Total Enclosure PTI Permit to Install RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA Air Pollutants ppm Parts per million P	NECLIAD	National Emission Ctandard for Hazardana	nnh	
NSPS New Source Performance Standards NSR New Source Review PS Performance Specification PSD Prevention of Significant Deterioration PTE Permanent Total Enclosure PTI Permit to Install RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA New Source Performance Standards ppmw Parts per million by volume Parts per million by and per million by and per square inch absolute psia Pounds per square inch ab	NESHAP			
NSR New Source Review PS Performance Specification PSD Prevention of Significant Deterioration PTE Permanent Total Enclosure PTI Permit to Install RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency Parts per million by weight Percent Percent Percent Pounds per square inch absolute Pounds per square inc	NSPS			
PS Performance Specification PSD Prevention of Significant Deterioration PTE Permanent Total Enclosure PTI Permit to Install RACT Reasonable Available Control Technology ROP Renewable Operating Permit SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA Percent psia Pounds per square inch absolute psig Pounds per square inch gauge Sc Standard cubic feet sec Seconds Sca Seconds Sca Seconds TAC Toxic Air Contaminant Temp Temperature Temperature The Total Hydrocarbons The Total Hydrocarbons The Tons per year The Microgram The Microgram Microgram Microgram Micrometer or Micron VOC Volatile Organic Compounds			' '	
PSD Prevention of Significant Deterioration PTE Permanent Total Enclosure PTI Permit to Install RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency Psia Pounds per square inch absolute psig Pounds per square inch abs				
PTE Permanent Total Enclosure PTI Permit to Install RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency Psig Pounds per square inch gauge scf Standard cubic feet Sc Seconds Sco Seconds TAC Toxic Air Contaminant Temp Temperature Temp Temperature The Total Hydrocarbons THC Total Hydrocarbons TEQ Microgram Usicrogram VOC Volatile Organic Compounds		•		
PTI Permit to Install RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency Scf Standard cubic feet sec Seconds SC Selective Selective Action TAC Toxic Air Contaminant Temp Temperature Temp Temperature Total Hydrocarbons ThC Total Hydrocarbons Temp Total Hydrocarbons ThC Total Grante Temp Total Hydrocarbons The Microgram Toxicity Equivalence Quotient The Micrometer of Micron VOC Volatile Organic Compounds				·
RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency SO2 Sulfur Dioxide TAC Toxic Air Contaminant Temp Temperature Temp Temperature The Total Hydrocarbons tpy Tons per year µg Microgram µm Micrometer or Micron VOC Volatile Organic Compounds	PTI		scf	
ROP Renewable Operating Permit SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency SO2 Sulfur Dioxide TAC Toxic Air Contaminant Temp Temperature That Total Hydrocarbons THC Total Hydrocarbons tpy Tons per year µg Microgram µm Micrometer or Micron VOC Volatile Organic Compounds		Reasonable Available Control Technology	sec	
SC Special Condition SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency TAC Toxic Air Contaminant Temp Temperature THC Total Hydrocarbons tpy Tons per year µg Microgram µm Micrometer or Micron VOC Volatile Organic Compounds			SO ₂	Sulfur Dioxide
SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction SRN State Registration Number tpy Tons per year TEQ Toxicity Equivalence Quotient				
SNCR Selective Non-Catalytic Reduction SRN State Registration Number tpy Tons per year TEQ Toxicity Equivalence Quotient μg Microgram USEPA/EPA United States Environmental Protection Agency VOC Volatile Organic Compounds		•		
SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency Agency Tons per year Microgram Micrometer or Micron VOC Volatile Organic Compounds		•		•
TEQ Toxicity Equivalence Quotient μg Microgram USEPA/EPA United States Environmental Protection Agency VOC Volatile Organic Compounds				•
USEPA/EPA United States Environmental Protection Agency VOC Volatile Organic Compounds		-		• •
Agency VOC Volatile Organic Compounds		• •		-
			•	
	VE		yr	

^{*}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 FGBOOTHS.

Inspections shall be performed on a daily basis to determine the integrity of the dry filters. The inspection should determine whether the dry filters are installed and operating properly. The filters should fit snug and have no gaps or holes. The permittee shall also check for leaks and overspray that may escape the filters.

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

There are no specific testing requirement plans or procedures for this ROP. 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-N0544-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

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

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGMACTWWWW.

The permittee shall use Table 1 in Appendix 7 to calculate organic HAP emission factors for the record keeping requirements in FGMACTWWWW.

Table 1

Table 1 to Subpart Streams	Table 1 to Subpart WWWW of Part 63Equations to Streams	Calculate Organic HAP Emissions	Factors for Specific Open Mold	to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process
As specified in § centrifugal casting	equations in	the following table to calculate	calculate organic HAP emissions factors for	for specific open molding and
If your operation And you use type is a new or existing	And you use	With	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP 234	Use this organic HAP emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat)
 open molding operation 	a. manual resin application	i. nonvapor-suppressed resin	= 0.126 x %HAP x 2000	= ((0.286 x %HAP)-0.0529) x
		ii. vapor-suppressed resin	EF = 0.126 x %HAP x 2000 x (1-(0.5 x VSE factor))	×
		<pre>iii. vacuum bagging/closed- mold curing with roll out</pre>	EF = 0.126 x %HAP x 2000 x 0.8	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.8
		<pre>iv. vacuum bagging/closed- mold curing without roll- out</pre>	EF = (0.126 x %HAP x 2000 x 0.5	EF = ((0.286 x %HAP)-0.0529) x 2000 x 0.5
	b. atomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000	$EF = ((0.714 \times 8HAP) - 0.18) \times 2000$
		ii. vapor-suppressed resin	EF = 0.169 x %HAP x 2000 x (1-(0.45 x VSE factor))	EF = ((0.714 x %HAP)-0.18) x 2000 x (1-(0.45 x VSE factor))
		<pre>iii. vacuum bagging/closed- mold curing with roll-out</pre>	0.169	$EF = ((0.714 \times \$HAP) - 0.18) \times 2000 \times 0.85$
		<pre>iv. vacuum bagging/closed-mold curing without roll-out</pre>	EF = 0.169 x %HAP x 2000 x 0.55	EF = $((0.714 \times \$HAP) - 0.18) \times 2000 \times 0.55$
		i. nonvapor-suppressed resin	EF = 0.107 x %HAP x 2000	$EF = ((0.157 \times \$HAP) - 0.0165) \times 2000$
		ii. vapor-suppressed resin	EF = 0.107 x %HAP x 2000 x (1-(0.45 x VSE factor))	EF = ((0.157 x %HAP)-0.0165) x 2000 x (1-(0.45 x VSE factor))
		iii. closed-mold curing with roll-out	$EF = 0.107 \times \text{%HAP} \times 2000 \times 0.85$	EF = ((0.157 x %HAP)-0.0165) x 2000 x 0.85
		<pre>iv. vacuum bagging/closed-mold curing without roll-out</pre>	EF = 0.107 x %HAP x 2000 x 0.55	EF = ((0.157 x %HAP)-0.0165) x 2000 x 0.55
	 d. atomized mechanical resin application with robotic or autgmated spray control 	nonvapor-suppressed resin	EF = 0.169 x %HAP x 2000 x 0.77	EF = 0.77 × ((0.714 × %HAF)-0.18) × 2000
	e. filament application 6	i. nonvapor-suppressed resin	EF = 0.184 x %HAP x 2000	$EF = ((0.2746 \times \$HAP) - 0.0298) \times 2000$
		ii. vapor-suppressed resin	EF = 0.12 x %HAP x 2000	$EF = ((0.2746 \times \$HAP) - 0.0298) \times 2000 \times 0.65$
	f. atomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000	EF = ((1.03646 x %HAP)-0.195) x 2000

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2000	2000			
g. nonatomized spray gel nonvapor-suppressed gel EF = 0.185 x %HAP x 2000 EF = ((0.4506 x %HAP)-0.0505) x 2000 coat application	EF = $((1.03646 \times \$HAP) - 0.195) \times 2000$ x 0.73		$EF = 0.558 \times (\$HAP) \times 2000$	b. vented molds, but air nonvapor-suppressed resin $EF = 0.026 \times (\$HAP) \times 2000$ $EF = 0.026 \times (\$HAP) \times 2000$ vented through the molds is not heated
EF = 0.185 x %HAP x 2000	EF = 0.445 x %HAP x 2000 x 0.73		nonvapor-suppressed resin EF = 0.558 x (%HAP) x 2000	EF = 0.026 x (%HAP) x 2000
nonvapor-suppressed gel coat	nonvapor-suppressed gel coat		nonvapor-suppressed resin	nonvapor-suppressed resin
g. nonatomized spray gel coat application	h. atomized spray gel coat application using robotic or automated	spray	a. heated air blown through molds	b. vented molds, but air vented through the molds is not heated
			2. centrifugal casting 78	operations

Footnotes to Table 1

These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facilit from using the equations in this table to calculate emission factors for purposes other then rule compliance if these equations are the most accurate ¹ The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart WWWM available.

² To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of 1bs of organic HAP per ton of resin or gel coat applied.

Tercent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33. ³ Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate,

4 The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this

automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized 5 This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used Automated or robotic spray systems using nonatomized spray should use the or mechanical nonatomized organic HAP emissions factor equation. appropriate nonatomized mechanical resin application equation.

or If resin is applied manually or with a spray gun, use the appropriate manual 6 Applies only to filament application using an open resin bath. mechanical application organic HAP emissions factor equation.

Centrifugal casting operations where the mold is 7 These equations are for centrifugal casting operations where the mold is vented during spinning. completely sealed after resin injection are considered to be closed molding operations.

the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the If a centrifugal casting operation uses mechanical or centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the 8 If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, entire operation as open molding with covered cure and no rollout to determine emission factors. calculate an emission factor for the portion of the process where spinning and cure occur.

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Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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

2022 Source Form

FORM REFERE	NCE				
Form Type	Source		AQD Source II	O (SRN)	N0544
SOURCE IDENT	TIFICATION				
Source Name	WARM RAI	N CORPORATION			
NAICS Code	326191		Portable		No
Physical Address	s (Street Address 1)			51675 N IN	DUSTRIAL DRIVE
Physical Address	s (Street Address 2)				
County	HOUGHTON	City	CALUMET	Zip Code	49930-
Latitude	47.16632 Decimal De	grees	Longitude	•	-88.5114 Decimal Degrees
Horizontal Collect	tion Method	004	•		
Source Map Scale	e Number		Horizontal Acc	uracy Measur	e 5 Meters
Horizontal Refere	ence Datum Code	03	Reference Po	int Code	101
Principal Product	UNITS	SS & ACRYLIC TUB	/ SHOWER	Number of E	Employees 49
Employer Federa	al Identification Number	382071397			
OWNER INFORI	MATION				
Owner Name	Ted Krons	chnabel			
Mailing Address	(Street Address 1)		51675 N. Indu	strial Drive	
Mailing Address	(Street Address 2)				
City	Calumet		State/Pro vince	Э	MI
Country	USA		Zip or Postal C	Code	49913-

2022 Contact Form

Form Type	Contact	AQD So	urce ID (SRN)	N0544		
		.				
MISSION INVENTO	ORY CONTACT (PRIMA	RY) INFORM	ATION			
Contact First Name, M	Middle Initial	Zachary	1	Contact	Last Name	Merrill
Contact Title	Quality Contr	ol Manager		•		
Mailing Address (Stree	et Address 1)		51675 N IN	DUSTRIAL	DRIVE	
Mailing Address (Stree	et Address 2)					
City Calum	net State/Province	· MI	Country	USA	Zip Code	49913
E-Mail Address (if ava	nilable) zn	nerrill@warm	rain.com			
Telephone Number	(906) 4823750)	Telephone	Extension		
Fax Number	()		<u> </u>			
EMISSION INVENT	ORY CONTACT (SECO	NDARY) INFO	PRMATION			
Contact First Name, M	/liddle Initial	James		Contact	Last Name	Benson
Contact Title	Plant Assista	nt Manager		•		
Mailing Address (Stree	et Address 1)		51675 N IN	DUSTRIAL	DRIVE	
Mailing Address (Stree	et Address 2)					
City Calum	net State/Province	e MI	Country	USA	Zip Code	49913
E-Mail Address (if ava	nilable) ib	enson@warn	nrain.com			
Telephone Number	(906) 4823750		Telephone	Extension		
i cichilone Hannbei	(300) 4020100	•				

2022 Contact Form

FORM REFEREN	CE						
Form Type	Contact	AQD So	AQD Source ID (SRN)		N0544		
		,					
EE INVOICE CON	NTACT INFORMATION (Fee Subject F	acilities Only)				
Contact First Name, Middle Initial		Brian		Contact	Mayworm		
Contact Title	General Man	anger		•			
Mailing Address (St	Mailing Address (Street Address 1)			IDUSTRIAL	. DRIVE		
Mailing Address (St	reet Address 2)						
City Calu	state/Province	e MI	Country	USA	Zip Code	49913	
E-Mail Address (if a	vailable) b	mayworm@w	/armrain.com				
Telephone Number	(906) 482375	0	Telephone	Extension			
Fax Number	(906) 482258	 5					

2022 Emission Unit Form

FORM REFERENCE						
Form Type Emis	ssion Unit	AQD Source	e ID (SRN)	N0544		
		•				
EMISSION UNIT IDENTIF	FICATION					
AQD Emission Unit ID	EU0020	EU ID		EUBOOTH	1	
NAICS Code (if different	from Source Form)	326191				
Installation Date MM/DD/	/YYYY 08/1 5	5/1976	Dismantle I	Date MM/DD/YY	YY	
Emission Unit Description Control Devices)	n - (Include Process Equip	ment and	Dry filter s	pray booth fo	non-atomized gelcoat application.	
Emission Unit Type			Spray Boo	th or Coating	Line	
Is this a combustion sour	rce?		N			
Is this combustion source	e used to generate electric	ity?				
Design Capacity	Desi	gn Capacity Nun	nerator		Design Capacity Denominator	
Maximum Nameplate Ca	pacity				Megawatts	_
RULE 201 APPLICA	BILITY					_
Grandfathered?	N					_
Exempt from Rule 201?	N	If Yes, Rule	Number			_
If Rule 201 Exempt, Is The	hroughput Below Reporting	g Thresholds?				_
Permit? Y		If Yes, Ente	r the Permit N	lumber	MI-ROP-N0544-2014	_
Is This Emission Unit Re	quired To Report Emission	ns To MAERS Fo	r This Report	ing Year?	Υ	
		CONTRO	L DEVICE	(S)		_
21. Control Device Code	FILTER					
		EMISSION	UNIT STAC	CK(S)		

2022 Emission Unit Form

FORM REFEREN	ICE				
Form Type	Emission Unit	AQD Sou	rce ID (SRN)	N0544	
		•			
EMISSION UNIT ID	ENTIFICATION				
AQD Emission Uni	t ID EU0021	EU ID		EUBOOTH2	
NAICS Code (if dif	ferent from Source Form	326191			
Installation Date M	M/DD/YYYY	08/15/1976	Dismantle Da	ate MM/DD/YYY	Y
Emission Unit Des Control Devices)	cription - (Include Proces	ss Equipment and		ray booth for glass lay-up p	non-atomized resin application process.
Emission Unit Type	е		Spray Bootl	h or Coating L	ine
Is this a combustio	n source?		N		
Is this combustion	source used to generate	electricity?			
Design Capacity		Design Capacity N	Numerator		Design Capacity Denominator
Maximum Namepla	ate Capacity	•			Megawatts
RULE 201 APPI	LICABILITY				
Grandfathered?	N				
Exempt from Rule	201? N	If Yes, R	ule Number		
If Rule 201 Exemp	t, Is Throughput Below F	Reporting Thresholds?)		
Permit?	Υ	If Yes, Er	nter the Permit Nu	ımber	MI-ROP-N0544
Is This Emission U	nit Required To Report E	missions To MAERS	For This Reportin	ng Year?	Υ
		CONT	ROL DEVICE(6)	
21. Control Device	Code FILTEI		ROL DEVICE(3)	
21. Control Device	FILIEI	`			
		EMISSIO	N UNIT STAC	K(S)	

2022 Emission Unit Form

FORM REFERENCE	E				
Form Type E ı	mission Unit	AQD Source	e ID (SRN)	N0544	
		•			
EMISSION UNIT IDEN	ITIFICATION				
AQD Emission Unit II	EU0022	EU ID		EUBOOTH3	
NAICS Code (if different	ent from Source Form)	326191			
Installation Date MM/	DD/YYYY	08/15/1976	Dismantle Da	te MM/DD/YYYY	,
Emission Unit Descrip Control Devices)	otion - (Include Process	Equipment and		ay booth for n glass lay-up pr	on-atomized resin application rocess.
Emission Unit Type			Spray Booth	or Coating Li	ne
Is this a combustion s	ource?		N		
Is this combustion so	urce used to generate el	ectricity?			
Design Capacity		Design Capacity Nur	merator		Design Capacity Denominator
Maximum Nameplate	Capacity			N	/legawatts
RULE 201 APPLIC	CABILITY				
Grandfathered?	N				
Exempt from Rule 20	1? N	If Yes, Rule	Number		
If Rule 201 Exempt, Is	s Throughput Below Rep	oorting Thresholds?			
Permit? Y		If Yes, Ente	r the Permit Nur	mber N	MI-ROP-N0544-2014
Is This Emission Unit	Required To Report Em	issions To MAERS Fo	or This Reporting	g Year?	Υ
		CONTRO	DL DEVICE(S	3)	
21. Control Device Co	de FILTER				
		EMISSION	UNIT STACK	((6)	
			UNII SIACE	(U)	

2022 Emission Unit Form

FORM REFERENCE					
Form Type Em	ission Unit	AQD Source	e ID (SRN)	N0544	
		•			
EMISSION UNIT IDENT	TIFICATION				
AQD Emission Unit ID	EU0023	EU ID		EUBOOTH4	
NAICS Code (if differen	nt from Source Form)	326191			
Installation Date MM/D	D/YYYY 0	8/15/1976	Dismantle Da	te MM/DD/YYY	(
Emission Unit Descript Control Devices)	ion - (Include Process E	quipment and		ay booth for r	non-atomized resin application rocess.
Emission Unit Type			Spray Booth	or Coating Li	ine
Is this a combustion so	urce?		N		
Is this combustion soul	rce used to generate ele	ectricity?			
Design Capacity		Design Capacity Nun	nerator		Design Capacity Denominator
Maximum Nameplate (Capacity			'	Megawatts
RULE 201 APPLIC	ABILITY				
Grandfathered?	N				
Exempt from Rule 201	? N	If Yes, Rule	Number		
If Rule 201 Exempt, Is	Throughput Below Repo	orting Thresholds?			
Permit? Y		If Yes, Ente	r the Permit Nun	mber	MI-ROP-N0544-2014
Is This Emission Unit F	Required To Report Emis	ssions To MAERS Fo	or This Reporting	g Year?	Υ
		CONTRO	L DEVICE(S	3)	
21. Control Device Cod	e FILTER				
		FMISSION	UNIT STACK	((S)	
l			CITIL CIACI	·(~ /	

2022 Reporting Group Form

Authorized under 1994 P.A. 451, as amended. Completion of this form is optional.

FORM REFERENCE			
Form Type Reporting	Group AQD S	ource ID (SRN) N0544	
•	•		
REPORTING GROUP IDEN	TIFICATION		
AQD Reporting Group ID	RG0001	Reporting Group ID	RGFIBERGLASS
Reporting Group Description		dry filter spray booths for non- ass lay-up process.	-atomized resin application during
REPORTING GROUP EMIS	SION UNITS		
7. Emission Unit ID	EUBOOTH2		
7. Emission Unit ID	EUBOOTH3		

EUBOOTH4

7. Emission Unit ID

2022 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

Form Type	Activity	AQD Source	e ID (SRN)	N0544	EU ID		EUBOOTH1	
ACTIVITY INF	ORMATION							
Source Classi	fication Code	e(SCC)	30800718					
SCC Comment			Dry filter spray b	ooth for non-at	omized gel	lcoat app	lication	
SEASONAL MA	TERIAL USAC	SE SCHEDUL	E, IF THROUGHPU	Γ IS > 0, THEN SE	ASONAL PE	ERCENTA	GES MUST TOTAL 100%	
Winter (Jan,Feb	o, Dec)	Spring (Ma	r-May)	Summer (Jun	Summer (Jun-Aug)		Fall (Sep-Nov)	
25		25		25		25		
OPERATING SC	HEDULE	•						
Hours per Day			Days per Week			Days p	er Year	
8			5			250		
MATERIAL INFO	ORMATION		•			•		
Material Code			Material Throughp	ut		Unit Co	Unit Code	
RESIN			101.62			TON		
Material Descrip	otion		FIBERGLASS FA	BRICATION		•		
VOC Content (d	coatings or solv	vent)	37 % by Weight		Density		11.5 LB/GAL	
BTUs (fuel)								
Sulfur Content ((fuel)	% by Weig	ght	Ash Content ((fuel)	% by V	Veight	

ATTACHMENT:

FORM REFERENCE

Document Name: Supporting Calculations 2022 File Name: MAERS 2022 Supporting Calcs.pdf

2022 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

Form Type	Activity	AQD Sou	rce ID (SRN)	N0544	EU ID		RGFIBERGLASS
					<u> </u>		
ACTIVITY INFOR	RMATION						
Source Classifica	ation Code	(SCC)	30800723				
SCC Comment							
SEASONAL MATE	RIAL USAG	E SCHEDU	ILE, IF THROUGH	PUT IS > 0, THEN	SEASONAL I	PERCENTA	GES MUST TOTAL 100%
Winter (Jan,Feb, D	Dec)	Spring (M	ar-May)	Summer (Jun-Aug)		Fall (Sep-Nov)
25		25		25	25		25
OPERATING SCHE	DULE			<u> </u>			•
Hours per Day			Days per Week	Days per Week		Days per Year	
8			5		250		
MATERIAL INFORI	MATION		•			I	
Material Code			Material Throug	Material Throughput		Unit Code	
COATING			416.91	416.91		TON	
Material Description	n		Fiberglass Re	sin Products		•	
VOC Content (coatings or solvent) 37.7 % by Wei		ight	Density		9.2 LB/GAL		
BTUs (fuel)							
Sulfur Content (fue	i l)	% by We	iaht	Ash Conte	nt (fuel)	% by \	Weight

ATTACHMENT:

Document Name: Supporting Calculations 2022 File Name: MAERS 2022 Supporting Calcs.pdf

2022 Emissions Form

FORM REFERENCE							
Form Type	Emissions	AQD Source ID	(SRN)	N0544	EU ID	RGFIBERGLASS	
SCC	30800723		Material (Code	COATING		

EMISSION INFORMATION					
Pollutant Code	VOC	Annual Emissions	37707 LB		
Emission Basis	EPA EF	•			
List Emission Factor	90.44	Exponent	1		
Emission Factor Unit Code		Control Efficiency	%		
Comment					

2022 Emissions Form

FORM REFERENCE						
Form Type	Emissions	AQD Source ID ((SRN)	N0544	EU ID	EUBOOTH1
SCC	30800718		Material	Code	RESIN	

EMISSION INFORMATION					
Pollutant Code	VOC	Annual Emissions	19983 LB		
Emission Basis	EPA EF				
List Emission Factor	196.65	Exponent	1		
Emission Factor Unit Code		Control Efficiency	%		
Comment		•			

2022 Preparer Form

FORM REFERE	NCE			
Form Type	Preparer	AQD Source ID (SRN)	N0544	

PREPARER'S INI	FORMATION					
Preparer's First Na	me, Middle Initial	Christop	her	Preparer's Last Name	Koucky	
Preparer's Title	Preparer's Title Environmental Engineer					
Mailing Address (Street Address 1) 2230 Park Ave						
Mailing Address (S	treet Address 2)	Suite 204				
City	Cincinnati	State/Province	ОН			
Country	USA	Zip Code	45229			
E-Mail Address (if a	available)	ckoucky@corne	r-enviro.com			
Telephone Number (513) 8084081			Telephone Ex	tension		
Fax Number	0		•			

PREPARER'S ID (only complete this area if you have more than one preparer)				
Preparer's Reporting Group or Emission Unit ID	EUBOOTH1			
Preparer's Reporting Group or Emission Unit ID	RGFIBERGLASS			

2022 Submittal Form

(Required Form)

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type	Submittal	AQD Source ID (SRN)	N0544			

SOURCE IDENTIFICATION						
Source Name	WARM RAI	N CORPORATION	N			
Mailing Address (Street Address 1) 51675 N INDUSTRIAL DRIVE					VE	
Mailing Address (S	Street Address 2)					
County	HOUGHTON	City	CALUMET		Zip Code	49930-
Submittal Method	Electronic				Amended Subr	nittal

PRIMARY PREPARER	'S AUTHORIZATION			
Based on information and beli	ief formed after reasonable inquiry, the	he statements and information in this submitta	al are true, accurate, and complete.	
Primary Preparer Zachary Merrill				
Telephone Number	(906)4823750	Telephone Extension	(906)4823750	
E-Mail Address (if available) staff@warmrain.com				
Signature		Date		

Certification Receipt:

- Submission ID: 20999
- Submission Received Date: 3/7/2023 10:36:53 AM
- · Certifier's (Primary Preparer) full name: Zachary Merrill
- Certifier's Address: 51675 Industrial Dr N Calumet MI 49913
- Email Address: staff@warmrain.com
- Certification Statement: Based on the information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate, and complete.
- · Security Question: what is the name of your home town newspaper?
- Answer to the security question: Encrypted on file
- PIN used: Encrypted on file
- Submitter's IP address: 47.6.9.72

Attachment Details:

Document Name	File Name	File Size	Description
Supporting Calculations 2022	MAERS 2022 Supporting Calcs.pdf	71295	
Supporting Calculations 2022	MAERS 2022 Supporting Calcs.pdf	71295	