

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

EFFECTIVE DATE: November 4, 2020

ISSUED TO

**Steelcase Inc., Kentwood Complex**

State Registration Number (SRN): N0677

LOCATED AT

5353 Broadmoor Avenue SE, Kentwood, Kent County, Michigan 49512

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

Administratively Complete ROP Renewal Application  
Due Between May 4, 2024 and May 4, 2025

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-N0677-2020

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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Heidi Hollenbach, Grand Rapids District Supervisor

**TABLE OF CONTENTS**

**AUTHORITY AND ENFORCEABILITY ..... 6**

**SECTION 1 – KENTWOOD WEST ..... 7**

**A. GENERAL CONDITIONS..... 8**

Permit Enforceability ..... 8

General Provisions..... 8

Equipment & Design ..... 9

Emission Limits ..... 9

Testing/Sampling ..... 9

Monitoring/Recordkeeping ..... 10

Certification & Reporting ..... 10

Permit Shield ..... 11

Revisions ..... 12

Reopenings..... 12

Renewals..... 13

Stratospheric Ozone Protection ..... 13

Risk Management Plan ..... 13

Emission Trading ..... 14

Permit to Install (PTI) ..... 14

**B. SOURCE-WIDE CONDITIONS ..... 15**

**C. EMISSION UNIT SPECIAL CONDITIONS ..... 19**

EMISSION UNIT SUMMARY TABLE ..... 19

EUKWW-MT-EMG-GEN ..... 20

**D. FLEXIBLE GROUP SPECIAL CONDITIONS..... 23**

FLEXIBLE GROUP SUMMARY TABLE ..... 23

FGKWW-RULE287(2)(c)..... 24

FGKWW-RULE290 ..... 26

**E. NON-APPLICABLE REQUIREMENTS ..... 29**

**APPENDICES ..... 30**

Appendix 1-1. Acronyms and Abbreviations ..... 30

Appendix 2-1. Schedule of Compliance ..... 31

Appendix 3-1. Monitoring Requirements ..... 31

Appendix 4-1. Recordkeeping ..... 31

Appendix 5-1. Testing Procedures ..... 31

Appendix 6-1. Permits to Install..... 31

Appendix 7-1. Emission Calculations ..... 32

Appendix 8-1. Reporting ..... 32

**A. GENERAL CONDITIONS..... 34**

Permit Enforceability ..... 34

General Provisions..... 34

Equipment & Design ..... 35

Emission Limits..... 35

Testing/Sampling ..... 35  
 Monitoring/Recordkeeping ..... 36  
 Certification & Reporting ..... 36  
 Permit Shield ..... 37  
 Revisions ..... 38  
 Reopenings..... 38  
 Renewals ..... 39  
 Stratospheric Ozone Protection ..... 39  
 Risk Management Plan ..... 39  
 Emission Trading ..... 40  
 Permit to Install (PTI) ..... 40

**B. SOURCE-WIDE CONDITIONS ..... 41**

**C. EMISSION UNIT SPECIAL CONDITIONS ..... 45**

EMISSION UNIT SUMMARY TABLE ..... 45  
 EU-EC-BOILER4 ..... 46  
 EU-EC-DIE-GENER ..... 49

**D. FLEXIBLE GROUP SPECIAL CONDITIONS ..... 52**

**E. NON-APPLICABLE REQUIREMENTS ..... 53**

**APPENDICES ..... 54**

Appendix 1-2. Acronyms and Abbreviations ..... 54  
 Appendix 2-2. Schedule of Compliance ..... 55  
 Appendix 3-2. Monitoring Requirements ..... 55  
 Appendix 4-2. Recordkeeping ..... 55  
 Appendix 5-2. Testing Procedures ..... 55  
 Appendix 6-2. Permits to Install..... 55  
 Appendix 7-2. Emission Calculations ..... 56  
 Appendix 8-2. Reporting ..... 57

**A. GENERAL CONDITIONS..... 59**

Permit Enforceability ..... 59  
 General Provisions ..... 59  
 Equipment & Design ..... 60  
 Emission Limits ..... 60  
 Testing/Sampling ..... 60  
 Monitoring/Recordkeeping ..... 61  
 Certification & Reporting ..... 61  
 Permit Shield ..... 62  
 Revisions ..... 63  
 Reopenings..... 63  
 Renewals ..... 64  
 Stratospheric Ozone Protection ..... 64  
 Risk Management Plan ..... 64  
 Emission Trading ..... 64  
 Permit to Install (PTI) ..... 65

**B. SOURCE-WIDE CONDITIONS ..... 66**

**C. EMISSION UNIT SPECIAL CONDITIONS ..... 70**

EMISSION UNIT SUMMARY TABLE..... 70

**D. FLEXIBLE GROUP SPECIAL CONDITIONS..... 71**

FLEXIBLE GROUP SUMMARY TABLE..... 71

FGKW-MT-EMG-GEN..... 72

FGNMF-RULE287(2)(c)..... 75

**E. NON-APPLICABLE REQUIREMENTS ..... 77**

**APPENDICES ..... 78**

Appendix 1-3. Acronyms and Abbreviations..... 78

Appendix 2-3. Schedule of Compliance ..... 79

Appendix 3-3. Monitoring Requirements ..... 79

Appendix 4-3. Recordkeeping ..... 79

Appendix 5-3. Testing Procedures ..... 79

Appendix 6-3. Permits to Install..... 79

Appendix 7-3. Emission Calculations ..... 80

Appendix 8-3. Reporting ..... 80

**A. GENERAL CONDITIONS..... 82**

Permit Enforceability ..... 82

General Provisions..... 82

Equipment & Design ..... 83

Emission Limits..... 83

Testing/Sampling ..... 83

Monitoring/Recordkeeping ..... 84

Certification & Reporting ..... 84

Permit Shield ..... 85

Revisions ..... 86

Reopenings..... 86

Renewals..... 87

Stratospheric Ozone Protection ..... 87

Risk Management Plan..... 87

Emission Trading ..... 87

Permit to Install (PTI) ..... 88

**B. SOURCE-WIDE CONDITIONS ..... 89**

**C. EMISSION UNIT SPECIAL CONDITIONS ..... 93**

EMISSION UNIT SUMMARY TABLE..... 93

EUWOOD-DIESELGEN..... 97

**D. FLEXIBLE GROUP SPECIAL CONDITIONS..... 100**

FLEXIBLE GROUP SUMMARY TABLE..... 100

FGWOOD-NSPSDc..... 101

FGWOOD-NESHAPJJ..... 103

FGWOOD-WOODWORKING ..... 106

FGWOOD-RULE287(2)(c) ..... 111

FGWOOD-RULE290..... 113

**E. NON-APPLICABLE REQUIREMENTS ..... 116**

**APPENDICES ..... 117**

Appendix 1-4. Acronyms and Abbreviations..... 117  
Appendix 2-4. Schedule of Compliance ..... 118  
Appendix 3-4. Monitoring Requirements ..... 118  
Appendix 4-4. Recordkeeping ..... 118  
Appendix 5-4. Testing Procedures ..... 119  
Appendix 6-4. Permits to Install..... 119  
Appendix 7-4. Emission Calculations ..... 119  
Appendix 8-4. Reporting ..... 120

## **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.

**Section 1 – Kentwood West**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**SECTION 1 – KENTWOOD WEST**

## **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.,



## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

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

### Equipment & Design

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

### Emission Limits

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

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

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

### Testing/Sampling

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

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### 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 state 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.

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

### Permit Shield

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

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

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

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- 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))**

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### Renewals

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

### Stratospheric Ozone Protection

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

### Risk Management Plan

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

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### Emission Trading

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

### Permit to Install (PTI)

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

### Footnotes:

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

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

## **Section 1 – Kentwood West**

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### **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.

**Section 1 – Kentwood West**

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

**SOURCE-WIDE CONDITIONS**

**DESCRIPTION**

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring/ Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. NO <sub>x</sub>	Less than 225 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.2, VI.3	<b>R 336.1205(3)</b>
2. SO <sub>2</sub>	Less than 225 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.2, VI.4	<b>R 336.1205(3)</b>
3. Each Individual HAP	Less than 9.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.5	<b>R 336.1205(3)</b>



**Section 1 – Kentwood West**

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Aggregate HAPs	Less than 22.5 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.5	<b>R 336.1205(3)</b>

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	471 million cubic feet per year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUEC-BOILER1 EUEC-BOILER2 and EUEC-BOILER4 in Section 2 – Energy Center	SC VI.2, SC VI.4	<b>R 336.1205(1)(a) and (3)</b>

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

1. The permittee shall not burn coal.<sup>2</sup> **(R 336.1205(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))**

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.<sup>2</sup> **(R 336.1205(3))**

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(1)(a) and (3))**
2. The permittee shall monitor, in a satisfactory manner, the fuel (diesel and natural gas) usage for each fuel burning process located source-wide per 12-month rolling time period as determined at the end of each calendar month.<sup>2</sup> **(R 336.1205(1)(a) and (3))**
3. The permittee shall keep the following information source-wide on a monthly basis:<sup>2</sup> **(R 336.1205(1)(a) and (3))**
  - a. The type and quantity of each fuel (diesel and natural gas) used in each fuel burning process.

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- b. The NO<sub>x</sub> emission factor of each fuel burned. (Emission factors are to be based on monitoring and testing at the facility, manufacturer certification, AP-42, or other as approved by the AQD District Supervisor.)
  - c. NO<sub>x</sub> emission calculations determining the monthly emission rate in tons per calendar month.
  - d. NO<sub>x</sub> emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
4. The permittee shall keep the following information source-wide on a monthly basis:<sup>2</sup> **(R 336.1205(1)(a) and (3))**
- a. The type and quantity of each fuel (diesel and natural gas) used in each fuel burning process.
  - b. The SO<sub>2</sub> emission factor of each fuel burned. (Emission factors are to be based on monitoring and testing at the facility, manufacturer certification, AP-42, or other as approved by the AQD District Supervisor.)
  - c. SO<sub>2</sub> emission calculations determining the monthly emission rate in tons per calendar month.
  - d. SO<sub>2</sub> emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
5. The permittee shall keep, in a satisfactory manner, individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.<sup>2</sup> **(R 336.1205(3))**

### **VII. REPORTING**

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

See Appendix 8-1

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

NA

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

1. Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in General Conditions in Part A of the ROP and Rule 213(4)(c). **(R 336.1213(4)(c))**

#### **Footnotes:**

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

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

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### 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
EUKWW-MAINTBOOTH	Maintenance paint booth with dry filter for particulate control.	04-19-1988 / NA	FGKWW-RULE287(2)(c)
EUKWW-SOLVENT	Final assembly and basic area solvents.	04-19-1988 / NA	FGKWW-RULE290
EUKWW-SOLVENTSHEET	Sheet line solvent usage.	04-19-1988 / NA	FGKWW-RULE290
EUKWW-ADHWELD	Adhesive usage, weld area.	04-19-2000 / NA	FGKWW-RULE290
EUKWW-MT-EMG-GEN	One stationary, existing 890 hp diesel-fired compression ignition (CI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rule 282(2)(b).	01-26-1990 / NA	NA

<b>EUKWW-MT-EMG-GEN EMISSION UNIT CONDITIONS</b>
--

**DESCRIPTION**

One stationary, existing 890 hp diesel-fired compression ignition (CI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rules 282(2)(b).

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. Beginning January 1, 2015, the permittee shall limit the sulfur content of diesel fuel to no more than 15 ppm by weight for each emergency CI-RICE with a site rating greater than 100 HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), or that operate for the purposes specified in 40 CFR 63.6640(f)(4)(ii) except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. **(40 CFR 63.6604(b))**

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

1. The permittee shall operate and maintain any affected RICE, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**
2. The permittee shall comply with the following requirements for emission units subject to 40 CFR Part 63, Subpart ZZZZ, the following requirements apply except during periods of startup: **(40 CFR 63.6603(a) and Table 2d)**
  - a. **For CI Engines:**
    - i. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2.
    - ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
    - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

3. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6603 and as listed in SC III.2. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i) for CI engines. **(40 CFR 63.6625(i))**

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

1. The permittee shall equip and maintain each existing emergency stationary RICE with a non-resettable hour meter to track the operating hours. **(40 CFR 63.6625(f))**
2. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air-pollution control practice for minimizing emissions. **(40 CFR 63.6625(e))**

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

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

1. If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content and maintain these within the acceptable limits as specified in 40 CFR 63.6625(i). **(40 CFR 63.6625(i))**

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep all records required by 40 CFR 63.6655 (except 63.6655(c)). **(40 CFR 63.6655(a))**
2. The permittee shall maintain, at a minimum, the following records by the applicable compliance date:
  - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart ZZZZ and the documentation supporting each notification and report. **(40 CFR 63.6655(a)(1))**
  - b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(2))**
  - c. Records of all required maintenance performed on the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(4))**
  - d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**
3. The permittee shall keep records as required in SC IV.2 to show continuous compliance with each emission or operating limit that applies. **(40 CFR 63.6655(d), 40 CFR 63.6660)**
4. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
5. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document: **(40 CFR 63.6655(f), 40CFR 63.6660)**
  - a. How many hours are spent for emergency operation.
  - b. What classified the operation as emergency.
  - c. How many hours are spent for non-emergency operation.

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- d. If the engines are used for demand response operation or as part of a financial arrangement the permittee must keep records of the notification of the emergency situation, the date and the start and end time the engine was operated as part of demand response.

### **VII. REPORTING**

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

See Appendix 8-1

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

NA

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

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, as they apply to EUKWW-MT-EMG-GEN. The permittee may choose an alternative compliance method not listed in EUKWW-MT-EMG-GEN by complying with all applicable provisions required by 40 CFR Part 63, Subpart ZZZZ for the compliance option chosen. **(40 CFR 70.6(9), 40 CFR 63.9(j), 40 CFR Part 63, Subparts A and ZZZZ)**

#### **Footnotes:**

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

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

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### 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
FGKWW-RULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.	EUKWW-MAINTBOOTH
FGKWW-RULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EUKWW-SOLVENT EUKWW-SOLVENTSHEET EUKWW-ADHWELD

**Section 1 – Kentwood West**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**FGKWW-RULE287(2)(c)  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.

**Emission Units installed on or after December 20, 2016:** Any future emission units that meet the requirements of this flexible group.

**Emission Units installed prior to December 20, 2016:** EUKWW-MAINTBOOTH

**POLLUTION CONTROL EQUIPMENT**

Dry Filter

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

<b>Material</b>	<b>Limit</b>	<b>Time Period/Operating Scenario</b>	<b>Equipment</b>	<b>Underlying Applicable Requirement</b>
1. Coatings	200 Gallons/month (minus water as applied)	Calendar month	Each emission unit	<b>R 336.1287(2)(c)(i)</b>

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

NA

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

- Any exhaust system installed on or after December 20, 2016, that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer’s specifications, or the permittee develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. All emission units installed before December 20, 2016, with an exhaust system that serves only coating spray equipment must have a properly installed and operated particulate control system. **(R 336.1213(2), R 336.1287(2)(c)(ii), R 336.1910)**

**V. TESTING/SAMPLING**

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

NA



## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 287(2)(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. **(R 336.1213(3))**
  - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(2)(c)(iii))**
  - b. Documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. **(R 336.1213(3))**

### **VII. REPORTING**

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

See Appendix 8-1

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

NA

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

NA

<b>FGKWW-RULE290</b> <b>FLEXIBLE GROUP CONDITIONS</b>
--

**DESCRIPTION**

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

**Emission Units installed on or after December 20, 2016:** Any future emission unit that meets the requirements of this flexible group.

**Emission Units installed prior to December 20, 2016:** EUKWW-SOLVENT, EUKWW-SOLVENTSHEET, EUKWW-ADHWELD

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

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

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

### II. MATERIAL LIMIT(S)

NA

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

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

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

NA

### V. TESTING/SAMPLING

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

NA

### VI. MONITORING/RECORDKEEPING

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

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

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

## **VII. REPORTING**

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

See Appendix 8-1

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

NA

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

NA

**Section 1 – Kentwood West**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**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).

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### APPENDICES

#### Appendix 1-1. Acronyms and Abbreviations

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

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

## Section 1 – Kentwood West

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### Appendix 2-1. Schedule of Compliance

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

### Appendix 3-1. Monitoring Requirements

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

### Appendix 4-1. Recordkeeping

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 5-1. Testing Procedures

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

### Appendix 6-1. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N0677-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N0677-2014a is being reissued as Source-Wide PTI No. MI-PTI-N0677-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201600028 / October 25, 2016	Restructure Section 6 of the ROP to reflect reduction in VOC emissions. The emission units will be regrouped into applicable tables FGRULE290 and FGRULE287(2)(c).	EUWOOD-LOWVOL EUWOOD-OFFLINE EUWOOD-WOODWORK FGWOOD-FINISH FGWOOD-FACILITY FGWOOD-SEALERS FGWOOD-CAMUNITS
79-15A	201600090 / October 25, 2016	Incorporate Opt-out limits for Hazardous Air Pollutants and PSD synthetic minor limits for NOx and SO <sub>2</sub> . Removal of Major Source Boiler conditions, removal of Boiler Compliance Assurance Monitoring requirements and removal of emission units.	Source-Wide Conditions in each Section of the ROP. FGEC-STOKERSCOAL/ SOLIDFUEL FGEC-NATGASBOILERS EUEC-COALHANDLING FGEC-BOILERS2&3CAM
NA	201600122 / October 25, 2016	Removal of Section 5 and the emission units associated with that section. Section 5 was associated with a building that was sold to another company.	EUKW-MT-EMG-GEN-CDC1 EUKW-MT-EMG-GEN-CDC2 EUKW-MT-EMG-GEN-CDC3
180-17	2020000076 / April 23, 2020*	Incorporate PTI for FGWOOD-WOODWORKING that had been erroneously voided.	FGWOOD-WOODWORKING

## **Section 1 – Kentwood West**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### **Appendix 7-1. Emission Calculations**

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

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

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

The permittee shall use 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.



**Section 2 – Energy Center**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**SECTION 2 – ENERGY CENTER**

## 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.,

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

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

### Equipment & Design

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

### Emission Limits

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

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

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

### Testing/Sampling

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

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### 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 state 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.

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

### Permit Shield

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

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

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

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

- 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))**

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### Renewals

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

### Stratospheric Ozone Protection

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

### Risk Management Plan

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

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### Emission Trading

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

### Permit to Install (PTI)

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

### Footnotes:

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

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



## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### 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.

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### SOURCE-WIDE CONDITIONS

#### DESCRIPTION

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.

#### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO <sub>x</sub>	Less than 225 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.2, VI.3	<b>R 336.1205(3)</b>
2. SO <sub>2</sub>	Less than 225 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.2, VI.4	<b>R 336.1205(3)</b>
3. Each Individual HAP	Less than 9.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.5	<b>R 336.1205(3)</b>

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Aggregate HAPs	Less than 22.5 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.5	<b>R 336.1205(3)</b>

### II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	471 million cubic feet per year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUEC-BOILER1, EUEC-BOILER2, and EUEC-BOILER4 in Section 2 – Energy Center	SC VI.2, SC VI.4	<b>R 336.1205(1)(a) and (3)</b>

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

1. The permittee shall not burn coal.<sup>2</sup> **(R 336.1205(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))**

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.<sup>2</sup> **(R 336.1205(3))**

### VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(1)(a) and (3))**
2. The permittee shall monitor, in a satisfactory manner, the fuel (diesel and natural gas) usage for each fuel burning process located source-wide per 12-month rolling time period as determined at the end of each calendar month.<sup>2</sup> **(R 336.1205(1)(a) and (3))**
3. The permittee shall keep the following information source-wide on a monthly basis:<sup>2</sup> **(R 336.1205(1)(a) and (3))**
  - a. The type and quantity of each fuel (diesel and natural gas) used in each fuel burning process.

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- b. The NO<sub>x</sub> emission factor of each fuel burned. (Emission factors are to be based on monitoring and testing at the facility, manufacturer certification, AP-42, or other as approved by the AQD District Supervisor.)
  - c. NO<sub>x</sub> emission calculations determining the monthly emission rate in tons per calendar month.
  - d. NO<sub>x</sub> emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
4. The permittee shall keep the following information source-wide on a monthly basis:<sup>2</sup> **(R 336.1205(1)(a) and (3))**
- a. The type and quantity of each fuel (diesel and natural gas) used in each fuel burning process.
  - b. The SO<sub>2</sub> emission factor of each fuel burned. (Emission factors are to be based on monitoring and testing at the facility, manufacturer certification, AP-42, or other as approved by the AQD District Supervisor.)
  - c. SO<sub>2</sub> emission calculations determining the monthly emission rate in tons per calendar month.
  - d. SO<sub>2</sub> emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
5. The permittee shall keep, in a satisfactory manner, individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.<sup>2</sup> **(R 336.1205(3))**

### **VII. REPORTING**

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

See Appendix 8-2

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

NA

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

1. Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in General Conditions in Part A of the ROP and Rule 213(4)(c). **(R 336.1213(4)(c))**

#### **Footnotes:**

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

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

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### 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
EUEC-BOILER1	Natural gas-fired Boiler #1 has a maximum heat input rate of 43.2 MMBTU/hr and a maximum steam production rate of 30,000 lb/hr. Emissions are not controlled.	09-01-1983 / NA	Source-Wide Conditions
EUEC-BOILER2	Natural gas-fired Boiler #2 has a maximum heat input capacity of 48 MMBTU/hr and a maximum steam production rate of 40,000 lb/hr. Emissions are not controlled.	12-01-1983 / NA	Source-Wide Conditions
EUEC-BOILER4	Natural gas-fired Boiler #4 has a maximum heat input rate is 90 MMBTU/hr and a maximum steam production rate of 70,000 lb/hr. Emissions are not controlled.	12-01-1983/ 01-25-1999	Source-Wide Conditions
EUEC-DIE-GENER	One stationary, existing 126 hp diesel-fired compression ignition (CI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rule 282(2)(b).	10-04-1983 / NA	NA

**Section 2 – Energy Center**

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

**EUEC-BOILER4  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Natural gas-fired Boiler #4 has a maximum heat input rate of 90 MMBTU/hr and a maximum steam production rate of 70,000 lb/hr.

**Flexible Group ID:** Source-Wide Conditions

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO <sub>x</sub>	9.0 pounds per hour <sup>2</sup>	Based on a 24-hour period of operating hours, as determined at the end of each calendar day	EUEC-BOILER4	SC V.1, VI.1 - VI.5	40 CFR 52.21
2. NO <sub>x</sub>	39.4 tons per year <sup>2</sup>	Based on a 12-month rolling time period	EUEC-BOILER4	SC V.1, VI.1 - VI.5	40 CFR 52.21
3. NO <sub>x</sub>	0.10 pound per million BTU heat input <sup>2</sup>	Based on a 24-hour rolling average	EUEC-BOILER4	SC V.1, VI.1 - VI.4	40 CFR 52.21

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	86,540 cubic feet per hour <sup>2</sup>	Based on a 24-hour rolling time period and a heating value of 1,040 BTU per scf natural gas and heat input of 90 MMBTU's per hour	EUEC-BOILER4	SC VI.1, VI.2	40 CFR 52.21

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

NA

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

NA

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

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

1. The AQD may request verification of NO<sub>x</sub> emission rates from EUEC-BOILER4 by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Method 7 (7E) – Determination of Nitrogen Oxide Emissions from Stationary Sources (Instrumental Analyzer Procedure). An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall monitor and record natural gas usage on an hourly basis.<sup>2</sup> **(40 CFR 52.21)**
2. Natural gas usage will be measured and recorded continuously using a flow meter which has a resolution of 86 standard cubic feet of natural gas and an accuracy of +/- 1.25% of the reading. **(R 336.1213(3))**
3. The permittee shall monitor and record steam production. Steam production will be measured and recorded continuously using a steam flow transmitter which has a resolution of 200 lbs. of steam and an accuracy of +/- 0.2% of the reading. **(R 336.1213(3))**
4. The permittee shall monitor the NO<sub>x</sub> emission rate from EUEC-BOILER4 during periods of normal operation. The NO<sub>x</sub> emission rate will be measured and recorded quarterly using a portable emission analyzer which has a resolution of 0.0001 lbs NO<sub>x</sub>/MMBTU of natural gas and an accuracy of +/- 5% of the reading. **(R 336.1213(3))**
5. The permittee shall keep, in a satisfactory manner, records of the hourly and 12-month rolling NO<sub>x</sub> emissions as calculated according to the methods detailed in Appendix 7-2. **(R 336.1213(3))**

See Appendix 7-2

### **VII. REPORTING**

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

See Appendix 8-2

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

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

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVEC-BOILER4	57 <sup>2</sup>	100 <sup>2</sup>	40 CFR 52.21

### IX. OTHER REQUIREMENT(S)

NA

#### Footnotes:

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

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



<b>EUEC-DIE-GENER EMISSION UNIT CONDITIONS</b>
--

**DESCRIPTION**

One stationary, existing 126 hp diesel-fired compression ignition (CI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rules 282(2)(b).

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. Beginning January 1, 2015, the permittee shall limit the sulfur content of diesel fuel to no more than 15 ppm by weight for each emergency CI-RICE with a site rating greater than 100 HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), or that operate for the purposes specified in 40 CFR 63.6640(f)(4)(ii) except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. **(40 CFR 63.6604(b))**

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

1. The permittee shall operate and maintain any affected RICE, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**
2. The permittee shall comply with the following requirements for emission units subject to 40 CFR Part 63, Subpart ZZZZ, the following requirements apply except during periods of startup: **(40 CFR 63.6603(a) and Table 2d)**
  - a. **For CI Engines:**
    - i. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2.
    - ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
    - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

3. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6603 and as listed in SC III.2. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i) for CI engines. **(40 CFR 63.6625(i))**

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

1. The permittee shall equip and maintain each existing emergency stationary RICE with a non-resettable hour meter to track the operating hours. **(40 CFR 63.6625(f))**
2. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air-pollution control practice for minimizing emissions. **(40 CFR 63.6625(e))**

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

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

1. If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content and maintain these within the acceptable limits as specified in 40 CFR 63.6625(i). **(40 CFR 63.6625(i))**

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep all records required by 40 CFR 63.6655 (except 63.6655(c)). **(40 CFR 63.6655(a))**
2. The permittee shall maintain, at a minimum, the following records by the applicable compliance date:
  - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart ZZZZ and the documentation supporting each notification and report. **(40 CFR 63.6655(a)(1))**
  - b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(2))**
  - c. Records of all required maintenance performed on the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(4))**
  - d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**
3. The permittee shall keep records as required in SC IV.2 to show continuous compliance with each emission or operating limit that applies. **(40 CFR 63.6655(d), 40 CFR 63.6660)**
4. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
5. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document: **(40 CFR 63.6655(f), 40CFR 63.6660)**
  - a. How many hours are spent for emergency operation.
  - b. What classified the operation as emergency.
  - c. How many hours are spent for non-emergency operation.

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- d. If the engines are used for demand response operation or as part of a financial arrangement the permittee must keep records of the notification of the emergency situation, the date and the start and end time the engine was operated as part of demand response.

### **VII. REPORTING**

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

See Appendix 8-2

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

NA

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

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, as they apply to EUEC-DIE-GENER. The permittee may choose an alternative compliance method not listed in EUEC-DIE-GENER by complying with all applicable provisions required by 40 CFR Part 63, Subpart ZZZZ for the compliance option chosen. **(40 CFR 70.6(9), 40 CFR 63.9(j), 40 CFR Part 63, Subparts A and ZZZZ)**

#### **Footnotes:**

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

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

## **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.

## **Section 2 – Energy Center**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### **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).

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### APPENDICES

#### Appendix 1-2. Acronyms and Abbreviations

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

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

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### Appendix 2-2. Schedule of Compliance

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

### Appendix 3-2. Monitoring Requirements

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

### Appendix 4-2. Recordkeeping

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

### Appendix 5-2. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

### Appendix 6-2. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N0677-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N0677-2014a is being reissued as Source-Wide PTI No. MI-PTI-N0677-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201600028/ October 25, 2016	Restructure Section 6 of the ROP to reflect reduction in VOC emissions. The emission units will be regrouped into applicable tables FGRULE290 and FGRULE287(2)(c).	EUWOOD-LOWVOL EUWOOD-OFFLINE EUWOOD-WOODWORK FGWOOD-FINISH FGWOOD-FACILITY FGWOOD-SEALERS FGWOOD-CAMUNITS
79-15A	201600090/ October 25, 2016	Incorporate Opt-out limits for Hazardous Air Pollutants and PSD limits on NOx and SO <sub>2</sub> . Removal of Major Source Boiler conditions, removal of Boiler Compliance Assurance Monitoring requirements and removal of emission units.	Source-Wide Conditions in each Section of the ROP. FGEC-STOKERSCOAL/ SOLIDFUEL FGEC-NATGASBOILERS EUEC-COALHANDLING FGEC-BOILERS2&3CAM
NA	201600122/ October 25, 2016	Removal of Section 5 and the emission units associated with that section. Section 5 was associated with a building that was sold to another company.	EUKW-MT-EMG-GEN-CDC1 EUKW-MT-EMG-GEN-CDC2 EUKW-MT-EMG-GEN-CDC3
180-17	2020000076/ April 23, 2020*	Incorporate PTI for FGWOOD-WOODWORKING that had been erroneously voided.	FGWOOD-WOODWORKING

## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### Appendix 7-2. 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 EUEC-BOILER4.

Pounds NOx per hour – The pounds of NOx emitted per hour will be calculated as follows:

$$E_{pph} = V_{ng} * \Delta H_{ng} * R_{NOx}$$

$V_{ng}$  - Natural Gas Usage in cubic feet of gas

$(\Delta H_{ng})$  - The specific heat content of the natural gas MMBTU/scf

$R_{NOx}$  - NOx Emission Rate in lbs/MMBTU

Natural Gas Heating Value ( $\Delta H_{ng}$ ) – The specific heat content of the natural gas used will be assumed to be 0.00104 million British Thermal Units per standard cubic foot (MMBTU/scf).

$R_{NOx}$  is evaluated from the graph at the steam loading ( $Q_s$ ) during that operating hour as measured during the most recent NOx emission study. The calculations for each operating hour during a calendar month will be completed monthly by the 30<sup>th</sup> of the following month.

Tons NOx per year – The tons of NOx emitted per year will be calculated as follows:

$$E_{tpy} = (\Sigma E_{pph}) / 2000$$

$\Sigma E_{pph}$  is the total pounds of NOx emitted during a sequence of 12 calendar months. The calculations for each 12-month period will be completed monthly by the 30<sup>th</sup> of the following month.

Pounds of NOx emissions per MMBTU – The pounds of NOx emitted per MMBTU per hour will be calculated as follows:

$$R_{NOx}$$

$R_{NOx}$  is evaluated from the graph at the steam loading ( $Q_s$ ) during that operating hour as measured during the most recent NOx emission study. The calculations for each operating hour during a calendar month will be completed monthly by the 30<sup>th</sup> of the following month.

Standard cubic feet (scf) per hour of natural gas – The scf of natural gas per hour will be calculated as follows:

$V_{ng}$  as measured each operating hour. The calculations for each operating hour during a calendar month will be completed monthly by the 30<sup>th</sup> of the following month.



## Section 2 – Energy Center

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### Appendix 8-2. 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

**Section 3 – Kentwood Seating &  
Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

**SECTION 3 – KENTWOOD SEATING & NON-MANUFACTURING FACILITIES**

## **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.,

### Section 3 – Kentwood Seating & Non-Manufacturing Facilities

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

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

#### Equipment & Design

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

#### Emission Limits

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

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

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

#### Testing/Sampling

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

## Section 3 – Kentwood Seating & Non-Manufacturing Facilities

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### 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 state 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.

## Section 3 – Kentwood Seating & Non-Manufacturing Facilities

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

### Permit Shield

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

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

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

### Section 3 – Kentwood Seating & Non-Manufacturing Facilities

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

- 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))**

## Section 3 – Kentwood Seating & Non-Manufacturing Facilities

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### Renewals

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

### Stratospheric Ozone Protection

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

### Risk Management Plan

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

### Emission Trading

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



**Section 3 – Kentwood Seating &  
Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**Permit to Install (PTI)**

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

**Footnotes:**

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

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

**Section 3 – Kentwood Seating &  
Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**B. SOURCE-WIDE CONDITIONS**

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

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

**SOURCE-WIDE CONDITIONS**

**DESCRIPTION**

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring/ Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. NO <sub>x</sub>	Less than 225 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.2, VI.3	<b>R 336.1205(3)</b>
2. SO <sub>2</sub>	Less than 225 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.2, VI.4	<b>R 336.1205(3)</b>
3. Each Individual HAP	Less than 9.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.5	<b>R 336.1205(3)</b>

**Section 3 – Kentwood Seating & Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Aggregate HAPs	Less than 22.5 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.5	<b>R 336.1205(3)</b>

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	471 million cubic feet per year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUEC-BOILER1 EUEC-BOILER2 and EUEC-BOILER4 in Section 2 – Energy Center	SC VI.2, SC VI.4	<b>R 336.1205(1)(a) and (3)</b>

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

1. The permittee shall not burn coal.<sup>2</sup> **(R 336.1205(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))**

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.<sup>2</sup> **(R 336.1205(3))**

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(1)(a) and (3))**
2. The permittee shall monitor, in a satisfactory manner, the fuel (diesel and natural gas) usage for each fuel burning process located source-wide per 12-month rolling time period as determined at the end of each calendar month.<sup>2</sup> **(R 336.1205(1)(a) and (3))**
3. The permittee shall keep the following information source-wide on a monthly basis:<sup>2</sup> **(R 336.1205(1)(a) and (3))**
  - a. The type and quantity of each fuel (diesel and natural gas) used in each fuel burning process.

### Section 3 – Kentwood Seating & Non-Manufacturing Facilities

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

- b. The NO<sub>x</sub> emission factor of each fuel burned. (Emission factors are to be based on monitoring and testing at the facility, manufacturer certification, AP-42, or other as approved by the AQD District Supervisor.)
  - c. NO<sub>x</sub> emission calculations determining the monthly emission rate in tons per calendar month.
  - d. NO<sub>x</sub> emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
4. The permittee shall keep the following information source-wide on a monthly basis:<sup>2</sup> **(R 336.1205(1)(a) and (3))**
- a. The type and quantity of each fuel (diesel and natural gas) used in each fuel burning process.
  - b. The SO<sub>2</sub> emission factor of each fuel burned. (Emission factors are to be based on monitoring and testing at the facility, manufacturer certification, AP-42, or other as approved by the AQD District Supervisor.)
  - c. SO<sub>2</sub> emission calculations determining the monthly emission rate in tons per calendar month.
  - d. SO<sub>2</sub> emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
5. The permittee shall keep, in a satisfactory manner, individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.<sup>2</sup> **(R 336.1205(3))**

#### **VII. REPORTING**

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

See Appendix 8-3

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

NA

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

1. Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in General Conditions in Part A of the ROP and Rule 213(4)(c). **(R 336.1213(4)(c))**

#### **Footnotes:**

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

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

**Section 3 – Kentwood Seating & Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

**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
EUPDC-SEATINGBOOTH	Paint booth with dry filter for particulate control located in the Physical Distribution Center within Kentwood Seating operations.	09-24-1986 / NA	FGNMF-RULE287(2)(c)
EUKW-MT-EMG-GEN-FLT-NG	One stationary, existing 100 hp natural gas fired spark ignition (SI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rule 282(2)(b).	05-01-1988 / NA	FGKW-MT-EMG-GEN
EUKW-MT-EMG-GEN-PDC	One stationary, existing 830 hp diesel-fired compression ignition (CI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rule 282(2)(b).	06-01-1980 / NA	FGKW-MT-EMG-GEN
EUFPH-FIRE-PUMP	One stationary, existing 340 hp diesel-fired compression ignition (CI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rule 282(2)(b).	03-18-1983 / NA	FGKW-MT-EMG-GEN

**Section 3 – Kentwood Seating &  
Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**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
FGKW-MT-EMG-GEN	One 830 hp and one 340 hp diesel-fired compression ignition (CI), reciprocating internal combustion engine (RICE) and one 100 hp existing spark ignition (SI) reciprocating internal combustion engine as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rules 282(2)(b).	EUKW-MT-EMG-GEN-FLT-NG EUKW-MT-EMG-GEN-PDC EUFPH-FIRE-PUMP
FGNMF-RULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.	EUPDC-SEATINGBOOTH

**FGKW-MT-EMG-GEN  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

One 830 hp and one 340 hp diesel-fired compression ignition (CI), reciprocating internal combustion engine (RICE) and one 100 hp existing spark ignition (SI) reciprocating internal combustion engine as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rules 282(2)(b).

**Emission Units:** EUKW-MT-EMG-GEN-FLT-NG, EUKW-MT-EMG-GEN-PDC, EUFPH-FIRE-PUMP

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. Beginning January 1, 2015, the permittee shall limit the sulfur content of diesel fuel to no more than 15 ppm by weight for each emergency CI-RICE with a site rating greater than 100 HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), or that operate for the purposes specified in 40 CFR 63.6640(f)(4)(ii) except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. **(40 CFR 63.6604(b))**

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

1. The permittee shall operate and maintain any affected RICE, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**
2. The permittee shall comply with the following requirements for emission units subject to 40 CFR Part 63, Subpart ZZZZ, the following requirements apply except during periods of startup: **(40 CFR 63.6603(a) and Table 2d)**
  - a. **For CI Engines:**
    - i. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2.
    - ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
    - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.



### **Section 3 – Kentwood Seating & Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

3. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6603 and as listed in SC III.2. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i) for CI engines. **(40 CFR 63.6625(i))**

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

1. The permittee shall equip and maintain each existing emergency stationary RICE with a non-resettable hour meter to track the operating hours. **(40 CFR 63.6625(f))**
2. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air-pollution control practice for minimizing emissions. **(40 CFR 63.6625(e))**

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

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

1. If using the oil analysis program for CI Engine(s) or SI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content and maintain these within the acceptable limits as specified in 40 CFR 63.6625(i) and 40 CFR 63.6625(j). **(40 CFR 63.6625(i)&(j))**

#### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep all records required by 40 CFR 63.6655 (except 63.6655(c)). **(40 CFR 63.6655(a))**
2. The permittee shall maintain, at a minimum, the following records by the applicable compliance date:
  - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart ZZZZ and the documentation supporting each notification and report. **(40 CFR 63.6655(a)(1))**
  - b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(2))**
  - c. Records of all required maintenance performed on the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(4))**
  - d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**
3. The permittee shall keep records as required in SC IV.2 to show continuous compliance with each emission or operating limit that applies. **(40 CFR 63.6655(d), 40 CFR 63.6660)**
4. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
5. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document: **(40 CFR 63.6655(f), 40CFR 63.6660)**
  - a. How many hours are spent for emergency operation.
  - b. What classified the operation as emergency.
  - c. How many hours are spent for non-emergency operation.

### **Section 3 – Kentwood Seating & Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

- d. If the engines are used for demand response operation or as part of a financial arrangement the permittee must keep records of the notification of the emergency situation, the date and the start and end time the engine was operated as part of demand response.

#### **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 8-3

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

NA

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

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, as they apply to EUKW-MT-EMG-GEN-FLT-NG, EUKW-MT-EMG-GEN-PDC and EU-FPH-FIRE-PUMP. The permittee may choose an alternative compliance method not listed in EUKW-MT-EMG-GEN-FLT-NG, EUKW-MT-EMG-GEN-PDC and EU-FPH-FIRE-PUMP by complying with all applicable provisions required by 40 CFR Part 63, Subpart ZZZZ for the compliance option chosen. **(40 CFR 70.6(9), 40 CFR 63.9(j), 40 CFR Part 63, Subparts A and ZZZZ)**

#### **Footnotes:**

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

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

**FGNMF-RULE287(2)(c)  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.

**Emission Units installed on or after December 20, 2016:** Any future emission unit that meets the requirements of this flexible group.

**Emission Units installed prior to December 20, 2016:** EUPDC-SEATINGBOOTH

**POLLUTION CONTROL EQUIPMENT**

Dry Filter

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 Gallons/month (minus water as applied)	Calendar month	Each emission unit	<b>R 336.1287(2)(c)(i)</b>

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

NA

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

- Any exhaust system installed on or after December 20, 2016, that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer’s specifications, or the permittee develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. All emission units installed before December 20, 2016, with an exhaust system that serves only coating spray equipment must have a properly installed and operated particulate control system. **(R 336.1213(2), R 336.1287(2)(c)(ii), R 336.1910)**

**V. TESTING/SAMPLING**

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

NA

**Section 3 – Kentwood Seating &  
Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 287(2)(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. **(R 336.1213(3))**
  - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(2)(c)(iii))**
  - b. Documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. **(R 336.1213(3))**

**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 8-3

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

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Section 3 – Kentwood Seating &  
Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**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 1-3. Acronyms and Abbreviations**

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

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

## Section 3 – Kentwood Seating & Non-Manufacturing Facilities

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

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

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

### Appendix 4-3. 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 5-3. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

### Appendix 6-3. 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-N0677-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N0677-2014a is being reissued as Source-Wide PTI No. MI-PTI-N0677-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201600028/ October 25, 2016	Restructure Section 6 of the ROP to reflect reduction in VOC emissions. The emission units will be regrouped into applicable tables FGRULE290 and FGRULE287(2)(c).	EUWOOD-LOWVOL EUWOOD-OFFLINE EUWOOD-WOODWORK FGWOOD-FINISH FGWOOD-FACILITY FGWOOD-SEALERS FGWOOD-CAMUNITS
79-15A	201600090/ October 25, 2016	Incorporate Opt-out limits for Hazardous Air Pollutants and PSD limits on NOx and SO <sub>2</sub> . Removal of Major Source Boiler conditions, removal of Boiler Compliance Assurance Monitoring requirements and removal of emission units.	Source-Wide Conditions in each Section of the ROP. FGEC-STOKERSCOAL/ SOLIDFUEL FGEC-NATGASBOILERS EUEC-COALHANDLING FGEC-BOILERS2&3CAM
NA	201600122/ October 25, 2016	Removal of Section 5 and the emission units associated with that section. Section 5 was associated with a building that was sold to another company.	EUKW-MT-EMG-GEN-CDC1 EUKW-MT-EMG-GEN-CDC2 EUKW-MT-EMG-GEN-CDC3
180-17	2020000076/ April 23, 2020*	Incorporate PTI for FGWOOD-WOODWORKING that had been erroneously voided.	FGWOOD-WOODWORKING

**Section 3 – Kentwood Seating &  
Non-Manufacturing Facilities**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**Appendix 7-3. Emission Calculations**

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

**Appendix 8-3. 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.



**Section 4 – Wood Furniture**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

**SECTION 4 – WOOD FURNITURE**

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### 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.,

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

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

### Equipment & Design

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

### Emission Limits

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

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

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

### Testing/Sampling

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### 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 state 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.

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

### Permit Shield

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

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- 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))**

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### 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))**

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### Permit to Install (PTI)

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

#### **Footnotes:**

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

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



## **Section 4 – Wood Furniture**

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### **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.

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### SOURCE-WIDE CONDITIONS

#### DESCRIPTION

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.

#### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO <sub>x</sub>	Less than 225 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.2, VI.3	<b>R 336.1205(3)</b>
2. SO <sub>2</sub>	Less than 225 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.2, VI.4	<b>R 336.1205(3)</b>
3. Each Individual HAP	Less than 9.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.5	<b>R 336.1205(3)</b>

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Aggregate HAPs	Less than 22.5 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment.	SC VI.5	R 336.1205(3)

### II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	471 million cubic feet per year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUEC-BOILER1, EUEC-BOILER2, and EUEC-BOILER4 in Section 2 – Energy Center	SC VI.2, SC VI.4	R 336.1205(1)(a) and (3)

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

1. The permittee shall not burn coal.<sup>2</sup> (R 336.1205(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))

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.<sup>2</sup> (R 336.1205(3))

### VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205(1)(a) and (3))
2. The permittee shall monitor, in a satisfactory manner, the fuel (diesel and natural gas) usage for each fuel burning process located source-wide per 12-month rolling time period as determined at the end of each calendar month.<sup>2</sup> (R 336.1205(1)(a) and (3))
3. The permittee shall keep the following information source-wide on a monthly basis:<sup>2</sup> (R 336.1205(1)(a) and (3))
  - a. The type and quantity of each fuel (diesel and natural gas) used in each fuel burning process.

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- b. The NO<sub>x</sub> emission factor of each fuel burned. (Emission factors are to be based on monitoring and testing at the facility, manufacturer certification, AP-42, or other as approved by the AQD District Supervisor.)
  - c. NO<sub>x</sub> emission calculations determining the monthly emission rate in tons per calendar month.
  - d. NO<sub>x</sub> emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
4. The permittee shall keep the following information source-wide on a monthly basis:<sup>2</sup> **(R 336.1205(1)(a) and (3))**
- a. The type and quantity of each fuel (diesel and natural gas) used in each fuel burning process.
  - b. The SO<sub>2</sub> emission factor of each fuel burned. (Emission factors are to be based on monitoring and testing at the facility, manufacturer certification, AP-42, or other as approved by the AQD District Supervisor.)
  - c. SO<sub>2</sub> emission calculations determining the monthly emission rate in tons per calendar month.
  - d. SO<sub>2</sub> emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
5. The permittee shall keep, in a satisfactory manner, individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.<sup>2</sup> **(R 336.1205(3))**

## VII. REPORTING

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

See Appendix 8-4

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

1. Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in General Conditions in Part A of the ROP and Rule 213(4)(c). **(R 336.1213(4)(c))**

### Footnotes:

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

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### 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
EUWOOD-DIESELGEN	One stationary, existing 474 hp diesel-fired compression ignition (CI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rule 282(2)(b).	11-28-2000 / NA	NA
EUWOOD-BOILER1	Natural gas-fired Boiler #1 has a maximum heat input rate of 24 MMBTU/hr. Emissions are not controlled.	11-28-2000 / NA	FGWOOD-NSPSDc
EUWOOD-BOILER2	Natural gas-fired Boiler #2 has a maximum heat input capacity of 24 MMBTU/hr. Emissions are not controlled.	11-28-2000 / NA	FGWOOD-NSPSDc
EUWOOD-HVSTAIN	Parts are loaded onto a flat belt and conveyed through the system. Stain and Wipe Stain booths and Topcoat booth use dry filters to control particulate emissions. The High-Volume Flat Line consists of two sections. They are:  1. Stain. In this section, coatings are applied using both manual and automatic applicators. VOC emissions are exhausted uncontrolled to the outdoor air. 2. Wipe Stain. In this section, coatings are applied with automatic applicators. VOC emissions are exhausted uncontrolled to the outdoor air.	11-28-2000 / 12-19-2006	FGWOOD-NESHAPJJ FGWOOD-RULE290
EUWOOD-HVCLEAR	Parts are loaded onto a flat belt and conveyed through the system. Sealer and Topcoat use dry filters to control particulate emissions.	12-18-2016 / NA	FGWOOD-NESHAPJJ FGWOOD-RULE290

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWOOD-LVSTAIN	<p>Parts are loaded onto a flat belt and conveyed through the system. Stain, Wipe Stain and Topcoat booths utilize dry filters to control particulate emissions. The Low-Volume Flat Line consists of two sections. They are:</p> <ol style="list-style-type: none"> <li>1. Stain. In this section, coatings are applied using both manual and automatic applicators. VOC emissions are exhausted uncontrolled to the outdoor air.</li> <li>2. Wipe Stain. In this section, coatings are applied using both manual and automatic applicators. VOC emissions are exhausted uncontrolled to the outdoor air.</li> </ol>	11-28-2000 / 12-19-2006 / 12-18-2015	FGWOOD-NESHAPJJ FGWOOD-RULE290
EUWOOD-LVCLEAR	Parts are loaded onto a flat belt and conveyed through the system. Sealer and Topcoat use dry filters to control particulate emissions.	12-18-2015 / NA	FGWOOD-NESHAPJJ FGWOOD-RULE290
EUWOOD-WORKSURFACE	Four coating booths, associated flash tunnels and UV ovens. Booths 1 and 2 are staining operations. Booth 3 uses manual HVLP guns to apply coatings. Booth 4 is a spray booth used to apply sealers. An electrically heated infrared oven follows each booth. All booths use dry filters to control particulate emissions.	05-01-2012 / NA	FGWOOD-NESHAPJJ FGWOOD-RULE290
EUWOOD-ROLL	The roll coat line is a conveyORIZED series of roll coat applications, curing lamps and sanding operations. This is a method of applying finishing materials to flat surfaces by passing the surface between rollers, one or both of which are coated with the material. The materials utilized convert to 100% solids upon curing.	11-28-2000 / 12-19-2006	FGWOOD-NESHAPJJ FGWOOD-RULE287(2)(c)

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWOOD-HANG	<p>Parts are loaded onto an overhead conveyor for transport through the system. All booths utilize dry filters to control particulate emissions. The Hang Line consists of three sections. They are:</p> <ol style="list-style-type: none"> <li>1. Stain. In this section, coatings are applied using both manual and automatic applicators. VOC emissions are exhausted uncontrolled to the outdoor air.</li> <li>2. Sealer. In the Sealer section, coatings known as both tie coats and sealers are applied manually. A flash tunnel and oven follow the booth. Coating, flash and cure VOC emissions are exhausted uncontrolled directly to the outdoor air.</li> <li>3. Topcoat. In this section, coatings are applied using manual applicators. VOC emissions are exhausted uncontrolled to the outdoor air.</li> </ol>	11-28-2000 / 12-19-2006	FGWOOD-NESHAPJJ FGWOOD-RULE290
EUWOOD-SPECIALS	The specials area consists of two spray booths and a batch oven. The function of the special area is to repair parts damaged during manufacture or handling, and to provide the facilities for finishing furniture not suited for the other lines. All finish steps requiring heat will use the batch oven. All booths utilize dry filters to capture particulate. The emissions from the Specials area are exhausted through stacks.	11-28-2000 / 12-19-2006	FGWOOD-NESHAPJJ FGWOOD-RULE287(2)(c)
EUWOOD-ADHESIVE	In this operation various wood veneer species are inspected for grade, trimmed, and assembled into sheets to adhere to core board that is cut to size. None of the processes in this unit are directly vented through a stack.	11-28-2000 / 12-19-2006	FGWOOD-NESHAPJJ FGWOOD-RULE290
EUWOOD-CLEANING	This group consists of liquid cleaning materials for cleaning process equipment.	11-28-00 / NA	FGWOOD-NESHAPJJ FGWOOD-RULE290
EUWOOD-DC-1	Woodworking equipment controlled by a 61,000 SCFM baghouse.	11-28-00 / NA	FGWOOD-WOODWORKING
EUWOOD-DC-2	Woodworking equipment controlled by a 81,000 SCFM baghouse.	11-28-00 / NA	FGWOOD-WOODWORKING
EUWOOD-DC-3	Woodworking equipment controlled by a 61,000 SCFM baghouse.	11-28-00 / NA	FGWOOD-WOODWORKING
EUWOOD-DC-4	Woodworking equipment controlled by a 81,000 SCFM baghouse.	11-28-00 / NA	FGWOOD-WOODWORKING
EUWOOD-DC-5	Woodworking equipment controlled by a 61,000 SCFM baghouse.	11-28-00 / NA	FGWOOD-WOODWORKING
EUWOOD-DC-7	Woodworking equipment controlled by a 61,000 SCFM baghouse.	11-28-00 / NA	FGWOOD-WOODWORKING

### Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date/ Modification Date</b>	<b>Flexible Group ID</b>
EUWOOD-DC-8	Woodworking equipment controlled by a 81,000 SCFM baghouse.	11-28-00 / NA	FGWOOD- WOODWORKING



**EUWOOD-DIESELGEN  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

One stationary, existing 474 hp diesel-fired compression ignition (CI) reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ (RICE MACT), 40 CFR 63.6590(a)(1), located at an Area Source, for emergency use and exempt from the requirements of Rule 201 pursuant to Rules 282(2)(b).

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. Beginning January 1, 2015, the permittee shall limit the sulfur content of diesel fuel to no more than 15 ppm by weight for each emergency CI-RICE with a site rating greater than 100 HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), or that operate for the purposes specified in 40 CFR 63.6640(f)(4)(ii) except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. **(40 CFR 63.6604(b))**

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

1. The permittee shall operate and maintain any affected RICE, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**
2. The permittee shall comply with the following requirements for emission units subject to 40 CFR Part 63, Subpart ZZZZ, the following requirements apply except during periods of startup: **(40 CFR 63.6603(a) and Table 2d)**
  - a. **For CI Engines:**
    - i. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2.
    - ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
    - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

3. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6603 and as listed in SC III.2. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i) for CI engines. **(40 CFR 63.6625(i))**

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

1. The permittee shall equip and maintain each existing emergency stationary RICE with a non-resettable hour meter to track the operating hours. **(40 CFR 63.6625(f))**
2. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air-pollution control practice for minimizing emissions. **(40 CFR 63.6625(e))**

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

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

1. If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content and maintain these within the acceptable limits as specified in 40 CFR 63.6625(i). **(40 CFR 63.6625(i))**

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep all records required by 40 CFR 63.6655 (except 63.6655(c)). **(40 CFR 63.6655(a))**
2. The permittee shall maintain, at a minimum, the following records by the applicable compliance date:
  - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart ZZZZ and the documentation supporting each notification and report. **(40 CFR 63.6655(a)(1))**
  - b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(2))**
  - c. Records of all required maintenance performed on the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(4))**
  - d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**
3. The permittee shall keep records as required in SC IV.2 to show continuous compliance with each emission or operating limit that applies. **(40 CFR 63.6655(d), 40 CFR 63.6660)**
4. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
5. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document: **(40 CFR 63.6655(f), 40CFR 63.6660)**
  - a. How many hours are spent for emergency operation.
  - b. What classified the operation as emergency.
  - c. How many hours are spent for non-emergency operation.

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- d. If the engines are used for demand response operation or as part of a financial arrangement the permittee must keep records of the notification of the emergency situation, the date and the start and end time the engine was operated as part of demand response.

### **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 8-4

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

NA

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

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, as they apply to EUWOOD-DIESELGEN. The permittee may choose an alternative compliance method not listed in EUWOOD-DIESELGEN by complying with all applicable provisions required by 40 CFR Part 63, Subpart ZZZZ for the compliance option chosen. **(40 CFR 70.6(9), 40 CFR 63.9(j), 40 CFR Part 63, Subparts A and ZZZZ)**

#### **Footnotes:**

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

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### 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
FGWOOD-NSPSDc	Small industrial, commercial, and institutional steam generating units subject to Standards of Performance NSPS Dc.	EUWOOD-BOILER1 EUWOOD-BOILER2
FGWOOD-NESHAPJJ	This flexible group consists of all equipment at the stationary source including equipment covered by NSR permits, grandfathered equipment, and exempt equipment involved in surface coating of wooden furniture and that meet the requirements in 40 CFR Part 63, Subpart JJ, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture.	EUWOOD-HVSTAIN EUWOOD-HVCLEAR EUWOOD-LVSTAIN EUWOOD-LVCLEAR EUWOOD-WORKSURFACE EUWOOD-ROLL EUWOOD-HANG EUWOOD-SPECIALS EUWOOD-ADHESIVE EUWOOD-CLEANING
FGWOOD-WOODWORKING	This flexible group consists of emission units composed of various types of woodworking equipment. Control equipment includes seven baghouses.	EUWOOD-DC-1 EUWOOD-DC-2 EUWOOD-DC-3 EUWOOD-DC-4 EUWOOD-DC-5 EUWOOD-DC-7 EUWOOD-DC-8
FGWOOD-RULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.	EUWOOD-ROLL EUWOOD-SPECIALS
FGWOOD-RULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EUWOOD-HVSTAIN EUWOOD-HVCLEAR EUWOOD-LVSTAIN EUWOOD-LVCLEAR EUWOOD-HANG EUWOOD-ADHESIVE EUWOOD-WORKSURFACE EUWOOD-CLEANING

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### FGWOOD-NSPSDc FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Small industrial, commercial, and institutional steam generating units subject to New Source Performance Standard 40 CFR Part 60, Dc.

**Emission Units:** EUWOOD-BOILER1, EUWOOD-BOILER2

#### **POLLUTION CONTROL EQUIPMENT**

NA

#### **I. EMISSION LIMIT(S)**

NA

#### **II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall only burn natural gas in FGWOOD-NSPSDc. **(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. As an alternative to meeting the requirements of paragraph (g)(1) of 40 CFR 60.48c, the owner or operator of an affected facility that combusts only natural gas may elect to record and maintain records of the amount of each fuel combusted during each calendar month. **(40 CFR 60.48c)**

#### **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 8-4

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

NA

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

1. The permittee shall comply with all applicable provisions of the New Source Performance Standards, as specified in 40 CFR Part 60, Subparts A and Dc, as they apply to FGWOOD-NSPSDc. **(40 CFR Part 60, Subparts A and Dc)**

#### **Footnotes:**

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

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

**FGWOOD-NESHAPJJ  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

This flexible group consists of all equipment at the stationary source including equipment covered by NSR permits, grandfathered equipment, and exempt equipment involved in surface coating of wooden furniture and that meet the requirements in 40 CFR Part 63, Subpart JJ, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture.

**Emission Units:** EUWOOD-HVSTAIN, EUWOOD-HVCLEAR, EUWOOD-LVSTAIN, EUWOOD-LVCLEAR, EUWOOD-ROLL, EUWOOD-HANG, EUWOOD-SPECIALS, EUWOOD-ADHESIVE, EUWOOD-WORKSURFACE EUWOOD-CLEANING

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

1. The permittee shall comply with the limits established in 40 CFR 63.802. **(40 CFR 63.802)**

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall comply with the Work Practice Standards in 40 CFR 63.803. **(40 CFR 63.803)**

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

NA

**V. TESTING/SAMPLING**

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

1. The permittee shall comply with the performance test method requirements in 40 CFR 63.805.<sup>2</sup> **(40 CFR 63.805)**
2. Performance test methods shall be used to calculate liquid coating Volatile Hazardous Air Pollutant (VHAP) content as provided in a Certified Product Data Sheet (CPDS).<sup>2</sup> **(40 CFR 63.801, 40 CFR 63.805)**

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain records in accordance with the requirements of 40 CFR 63.806. **(40 CFR 63.806)**
2. Recordkeeping Requirements for all Compliance Methods:
  - a. The permittee shall fulfill all recordkeeping requirements of 40 CFR 63.10 of Subpart A. **(40 CFR 63.10 of Subpart A)**

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

- b. The permittee shall maintain records of the following:
  - i. A certified product data sheet for each finishing material, thinner, contact adhesive and strippable spray booth coating subject to the emission limits in 40 CFR 63.802; and **(40 CFR 63.806)(b)(1))**
  - ii. The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in 40 CFR 63.802; and **(40 CFR 63.806)(b)(2))**
  - iii. The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in 40 CFR 63.802 (a)(3) or (b)(3). **(40 CFR 63.806)(b)(3))**
3. Finishing Operations - Averaging Approach
  - a. The permittee following the compliance method in 40 CFR 63.804(a)(1) or (d)(1), shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1. **(40 CFR 63.806)(c))**
4. Finishing Operations - Continuous Coating
  - a. The permittee following the compliance procedures of 40 CFR 63.804(f)(3)(ii) and (g)(3)(ii), shall maintain the records required by 40 CFR 63.806(b), as well as records of the following:
    - i. Solvent and coating additions to the continuous coater reservoir; **(40 CFR 63.806)(d)(1))**
    - ii. Viscosity measurements; and **(40 CFR 63.806)(d)(2))**
    - iii. Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance. **(40 CFR 63.806)(d)(3))**
5. Control System
  - a. The permittee following the compliance method of 40 CFR 63.804(f)(4) or (g)(4) shall maintain copies of the calculations demonstrating that the overall control efficiency (R) of the control system results in the value of  $E_{ac}$  required by Equation 2, records of the operating parameter values and copies of the semiannual compliance reports required by 40 CFR 63.807(d). **(40 CFR 63.806)(f))**
6. Finishing Operations - Combination of Compliance Methods
  - a. The permittee following the compliance method of 40 CFR 63.804(f)(6) or (g)(6) shall maintain copies of the calculations demonstrating that the overall control efficiency (R) of the control system results in the applicable value of  $G_{ac}$  calculated using Equation 3, records of the operating parameter values and copies of the semiannual compliance reports required by 40 CFR 63.807(d). **(40 CFR 63.806)(g))**
7. Work Practice Plan
  - a. The permittee shall maintain on-site the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
    - i. Records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place; **(40 CFR 63.806)(e)(1))**
    - ii. Records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c); **(40 CFR 63.806)(e)(2))**
    - iii. Records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d); **(40 CFR 63.806)(e)(3))**
    - iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 CFR 63.803(h)(5); **(40 CFR 63.806)(e)(4))**
    - v. Records associated with the formulation assessment plan required by 40 CFR 63.803(l); and **(40 CFR 63.806)(e)(5))**
    - vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed. **(40 CFR 63.806)(e)(6))**



## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

8. The permittee following the compliance provisions of 40 CFR 63.804(f)(1), (2), (3), (5), (7) and (8) and 40 CFR 63.804(g) (1), (2), (3), (5), (7) and (8), shall maintain records of the compliance certifications submitted in accordance with 40 CFR 63.807(c) for each semiannual period following the compliance date. **(40 CFR 63.806)(h))**
9. The permittee shall maintain records of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b) and the semiannual reports required by 40 CFR 63.807(c). **(40 CFR 63.806)(i))**
10. The permittee shall maintain all records in accordance with the requirements of 40 CFR 63.10(b)(1). **(40 CFR 63.806)(j))**

See Appendix 7-4

### **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 8-4

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

NA

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

1. The permittee shall develop and implement a written startup, shutdown and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR Part 63, Subpart JJ. **(40 CFR 63.6(e))**
2. The permittee shall meet all applicable requirements of 40 CFR Part 63, Subpart A and Subpart JJ. **(40 CFR Part 63)**

#### **Footnotes:**

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

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

<h3 style="margin: 0;">FGWOOD-WOODWORKING FLEXIBLE GROUP CONDITIONS</h3>
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### DESCRIPTION

This flexible group consists of emission units composed of various types of woodworking equipment. Control equipment includes seven baghouses.

**Emission Units:** EUWOOD-DC-1, EUWOOD-DC-2, EUWOOD-DC-3, EUWOOD-DC-4, EUWOOD-DC-5, EUWOOD-DC-7, EUWOOD-DC-8

### POLLUTION CONTROL EQUIPMENT

Seven baghouses, each equipped with an internal cyclone collector

### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM10	1.92 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUWOOD-DC-1, EUWOOD-DC-3, EUWOOD-DC-5, EUWOOD-DC-7  The limit is applicable to the emission units combined.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>
2. PM10	0.137 pounds per hour <sup>2</sup>	Hourly	EUWOOD-DC-1, EUWOOD-DC-3, EUWOOD-DC-5, EUWOOD-DC-7  The limit is applicable to each individual emission unit.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>
3. PM10	1.91 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUWOOD-DC-2, EUWOOD-DC-4, EUWOOD-DC-8  The limit is applicable to the emission units combined.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>
4. PM10	0.182 pounds per hour <sup>2</sup>	Hourly	EUWOOD-DC-2, EUWOOD-DC-4, EUWOOD-DC-8  The limit is applicable to each individual emission unit.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
5. PM2.5	1.92 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUWOOD-DC-1, EUWOOD-DC-3, EUWOOD-DC-5, EUWOOD-DC-7  The limit is applicable to the emission units combined.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>
6. PM2.5	0.137 pounds per hour <sup>2</sup>	Hourly	EUWOOD-DC-1, EUWOOD-DC-3, EUWOOD-DC-5, EUWOOD-DC-7  The limit is applicable to each individual emission unit.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>
7. PM2.5	1.91 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUWOOD-DC-2, EUWOOD-DC-4, EUWOOD-DC-8  The limit is applicable to the emission units combined.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>
8. PM2.5	0.182 pounds per hour <sup>2</sup>	Hourly	EUWOOD-DC-2, EUWOOD-DC-4, EUWOOD-DC-8  The limit is applicable to each individual emission unit.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>
9. PM	0.0005 lb/1,000 lbs of exhaust gases <sup>2</sup>	Hourly	EUWOOD-DC-1, EUWOOD-DC-2, EUWOOD-DC-3, EUWOOD-DC-4, EUWOOD-DC-5, EUWOOD-DC-7, EUWOOD-DC-8  The limit is applicable to each individual emission unit.	SC VI.1- VI.5	<b>40 CFR 52.21(c) and (d)</b>

### II. MATERIAL LIMIT(S)

NA

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

- The permittee shall not operate any of the woodworking processes while directing the exhaust stream from the woodworking baghouse control system to the outdoor air for more than 28,000 hours per year combined for baghouses associated with EUWOOD-DC-1, EUWOOD-DC-3, EUWOOD-DC-5, EUWOOD-DC-7 and 21,000 hours combined for baghouses associated with EUWOOD-DC-2, EUWOOD-DC-4, EUWOOD-DC-8 based

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

upon a 12-month rolling time period. The remainder of the year the exhaust air from the woodworking baghouse collectors will be recirculated to the plant building.<sup>2</sup> **(40 CFR 52.21)**

2. The permittee shall not operate any of the woodworking equipment unless their respective baghouse dust collector systems each consisting of an internal cyclone collector in series with a baghouse collector are installed and operating properly.<sup>2</sup> **(40 CFR 52.21)**

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

NA

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

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

NA

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall perform (non-certified) visual observations for opacity on a weekly basis when the emission unit is operating and record the findings.<sup>2</sup> **(R 336.1910)**
2. The permittee shall maintain a record of the hours of operation for each woodworking process control device while exhausting to the outdoor air.<sup>2</sup> **(R 336.1910)**
3. The permittee shall maintain all records as required by the Preventative Maintenance Plan. **(R 336.1213(3))**
4. The permittee shall record a daily non-certified visual opacity observation from each baghouse in FGWOOD-WOODWORKING as an indicator of proper operation of the dust collector. The indicator range defining proper operation is the absence of visible emissions. **(40 CFR 64.6(c)(1)(i) and (ii))**
5. The pressure drop gauge shall continuously monitor the pressure drop and record daily. The indicator range defining proper operation is 1 – 5" WC. The averaging period is continuous. Each pressure drop monitor shall be calibrated or replaced annually. **(40 CFR 64.6(c)(1)(i), (ii) & (iii))**
6. An excursion is a departure from the indicator range of no visible emissions on a 6-minute average or a departure from the indicator range of 1-5" WC for pressure drop readings. **(40 CFR 64.6(c)(2))**
7. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). If visible emissions are observed, corrective action is initiated beginning with an evaluation to determine the action required to correct the issue. If the pressure drop range is exceeded, an inspection and corrective action is implemented. **(40 CFR 64.7(d))**
8. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

9. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
10. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

**See Appendix 3-4**

### **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))**
4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

**See Appendix 8-4**

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

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-WW-DC1	60 <sup>2</sup>	40 <sup>2</sup>	<b>40 CFR 52.21 (c) and (d)</b>
2. SV-WW-DC2	72 <sup>2</sup>	40 <sup>2</sup>	<b>40 CFR 52.21 (c) and (d)</b>
3. SV-WW-DC3	60 <sup>2</sup>	40 <sup>2</sup>	<b>40 CFR 52.21 (c) and (d)</b>
4. SV-WW-DC4	72 <sup>2</sup>	40 <sup>2</sup>	<b>40 CFR 52.21 (c) and (d)</b>
5. SV-WW-DC5	60 <sup>2</sup>	40 <sup>2</sup>	<b>40 CFR 52.21 (c) and (d)</b>
6. SV-WW-DC7	60 <sup>2</sup>	40 <sup>2</sup>	<b>40 CFR 52.21 (c) and (d)</b>
7. SV-WW-DC8	72 <sup>2</sup>	40 <sup>2</sup>	<b>40 CFR 52.21 (c) and (d)</b>

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain an acceptable Preventative Maintenance Plan. Any modifications to the plan shall be submitted to the AQD District Supervisor.<sup>2</sup> **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))**
2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**
3. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

#### **Footnotes:**

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

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### FGWOOD-RULE287(2)(c) FLEXIBLE GROUP CONDITIONS

#### DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.

**Emission Units installed on or after December 20, 2016:** Any future emission unit that meets the requirements of this flexible group.

**Emission Units installed prior to December 20, 2016:** EUWOOD-ROLL, EUWOOD-SPECIALS

#### POLLUTION CONTROL EQUIPMENT

Dry Filter

#### I. EMISSION LIMIT(S)

NA

#### II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 Gallons/month (minus water as applied)	Calendar month	Each emission unit	R 336.1287(2)(c)(i)

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

NA

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

1. Any exhaust system installed on or after December 20, 2016, that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the permittee develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. All emission units installed before December 20, 2016, with an exhaust system that serves only coating spray equipment must have a properly installed and operated particulate control system. (R 336.1213(2), R 336.1287(2)(c)(ii), R 336.1910)

#### V. TESTING/SAMPLING

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

NA

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 287(2)(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. **(R 336.1213(3))**
  - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(2)(c)(iii))**
  - b. Documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. **(R 336.1213(3))**

### **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 8-4

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

NA

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

NA



<b>FGWOOD-RULE290</b> <b>FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

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

**Emission Units installed on or after December 20, 2016:** Any future emission unit that meets the requirements of this flexible group.

**Emission Units installed prior to December 20, 2016:** EUWOOD-HVSTAIN, EUWOOD-HVCLEAR, EUWOOD-LVSTAIN, EUWOOD-LVCLEAR, EUWOOD-HANG, EUWOOD-ADHESIVE, EUWOOD-WORKSURFACE, EUWOOD-CLEANING

**POLLUTION CONTROL EQUIPMENT**

Dry Filter

**I. EMISSION LIMIT(S)**

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

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

### II. MATERIAL LIMIT(S)

NA

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

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

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

NA

### V. TESTING/SAMPLING

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

NA

### VI. MONITORING/RECORDKEEPING

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

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020

Expiration Date: November 4, 2025

PTI No: MI-PTI-N0677-2020

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

## **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 8-4

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

NA

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

NA

## **Section 4 – Wood Furniture**

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### **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).

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### APPENDICES

#### Appendix 1-4. Acronyms and Abbreviations

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

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

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

### Appendix 2-4. 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 3-4. Monitoring Requirements

#### A. FGWOOD-WOODWORKING

##### Preventative Maintenance Plan

1) Equipment list	DC 1	Asset #21460
	DC 2	Asset #124554
	DC 3	Asset #21452
	DC 4	Asset #124003
	DC 5	Asset #21456
	DC 7	Asset #124004
	DC 8	Asset #21464

##### 2) Responsibility

Individuals responsible for inspecting, maintaining and repairing emission control devices:

Facilities Manager (Maintenance) – Primary for most activities

Environmental Engineer – primary for weekly visible emissions check

##### 3) Inspections

Description of items or conditions that will be inspected:

Item/Condition Inspected	Schedule	Records
Check pressure drop	Weekly	Spreadsheet
Check for visible emissions	Weekly	Spreadsheet
Alarm monitoring program	Continuous	BEAST System

##### 4) Operation and Maintenance Schedule

Dust collector maintenance is scheduled and recorded on the maintenance program. Individual activities are scheduled and adjusted as needed based on observations and operational conditions.

##### 5) Spare Parts

Spare parts for each cyclone/baghouse are listed in the O & M manual for each unit. The manuals are located in the Maintenance department. Major spare parts maintained in inventory include:

Filter Tubes (bags)  
Main Fan Motors  
Air Lock Rebuild Kits

### Appendix 4-4. 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.

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
 Expiration Date: November 4, 2025  
 PTI No: MI-PTI-N0677-2020

### Appendix 5-4. Testing Procedures

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

### Appendix 6-4. 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-N0677-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N0677-2014a is being reissued as Source-Wide PTI No. MI-PTI-N0677-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201600028/ October 25, 2016	Restructure Section 6 of the ROP to reflect reduction in VOC emissions. The emission units will be regrouped into applicable tables R290 and R287(2)(c).	EUWOOD-LOWVOL EUWOOD-OFFLINE EUWOOD-WOODWORK FGWOOD-FINISH FGWOOD-FACILITY FGWOOD-SEALERS FGWOOD-CAMUNITS
79-15A	201600090/ October 25, 2016	Incorporate Opt-out limits for Hazardous Air Pollutants and PSD limits on NOx and SO <sub>2</sub> . Removal of Major Source Boiler conditions, removal of Boiler Compliance Assurance Monitoring requirements and removal of emission units.	Source-Wide Conditions in each Section of the ROP. FGEC-STOKERSCOAL/ SOLIDFUEL FGEC-NATGASBOILERS EUEC-COALHANDLING FGEC-BOILERS2&3CAM
NA	201600122/ October 25, 2016	Removal of Section 5 and the emission units associated with that section. Section 5 was associated with a building that was sold to another company.	EUKW-MT-EMG-GEN-CDC1, EUKW-MT-EMG-GEN-CDC2, EUKW-MT-EMG-GEN-CDC3
180-17	2020000076/ April 23, 2020*	Incorporate PTI for FGWOOD-WOODWORKING that had been erroneously voided.	FGWOOD-WOODWORKING

### Appendix 7-4. 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 FGWOOD-NESHAPJJ. Alternative calculations must be approved by the AQD District Supervisor.

Use Equation 1 from 40 CFR 63.804(a)(1) to calculate the VHAP content if using averaging approach compliance for finishing materials.

$$\text{Eqn 1: } E = (M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n) \div (M_{c1} + M_{c2} + \dots + M_{cn})$$

Where:

E = emission limit (lb VHAP/lb solids)

## Section 4 – Wood Furniture

ROP No: MI-ROP-N0677-2020  
Expiration Date: November 4, 2025  
PTI No: MI-PTI-N0677-2020

$M_c$	=	mass of solids in the finishing material (c) (lb solids/month)
$C_c$	=	VHAP content of the finishing material (c) (lb VHAP/lb solids, as supplied)
$S$	=	VHAP content of a solvent added to finishing materials, expressed as a weight fraction
$W$	=	amount of solvent added to finishing materials during the monthly averaging period (lb)
$n$	=	number of finishing materials used.

**40 CFR 63.804(a)(1)**

Use Equation 2 from to determine the overall control efficiency if using control system to determine compliance.

$$\text{Eqn 2: } R = [(E_{bc} - E_{ac}) / E_{bc}] (100)$$

Where:

$R$	=	the overall efficiency of the control system
$E_{bc}$	=	emissions before the control system is installed and operated, calculated using Equation 1 (lb VHAP/lb solids)
$E_{ac}$	=	emissions after the control system is installed and operated (lb VHAP/lb solids).

**40 CFR 63.804(a)(3)**

Use Equation 3 from 40 CFR 63.804(a)(2) to determine the overall control efficiency when using control system to determine compliance for contact adhesives.

$$\text{Eqn 3: } R = [(G_{bc} - G_{ac}) / G_{bc}] (100)$$

Where:

$R$	=	the overall efficiency of the control system
$G_{bc}$	=	VHAP content of the contact adhesive before control (lb VHAP/lb solids)
$G_{ac}$	=	VHAP content of the contact adhesive after the control system is installed and operated (lb VHAP/lb solids).

**40 CFR 63.804(a)(2)**

### Appendix 8-4. 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.