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

EFFECTIVE DATE: November 20, 2023

**ISSUED TO** 

# **LexaMar Corporation**

State Registration Number (SRN): N2812

**LOCATED AT** 

100 LexaMar Drive, Boyne City, Charlevoix County, Michigan 49712

# RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N2812-2023

Expiration Date: November 20, 2028

Administratively Complete ROP Renewal Application Due Between May 20, 2027 and May 20, 2028

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-N2812-2023

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

Michigan Department of Environment, Great Lakes, and Energy

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# **AUTHORITY AND ENFORCEABILITY**

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

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

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

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

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

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# A. GENERAL CONDITIONS

# **Permit Enforceability**

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

#### **General Provisions**

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

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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. (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))

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# 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.

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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))

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- 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 followina:
  - 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))

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### 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))

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

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

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# **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.

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# 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.

# **{REMOVE THIS TABLE IF THERE ARE NO EMISSION UNITS}**

#### **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
EUBCPL	The Body Color Paint Line includes 5 spray booths, 5 flash off areas, an associated curing oven, and exhaust air recirculation system for the spray booths. Control includes a Permanent Total Enclosure (PTE), filters on the spray booth and a regenerative thermal oxidizer (RTO).	01-01-1995 05-01-2001	FGMACTPPPP FGCAM
EUURSAMINOR	Surface Coating of Automotive Plastic Parts: The Ursa Minor Dip Coat Line includes two dip tanks each with an associated curing oven. The dip tanks exhaust to a Permanent Total Enclosure (PTE) which is controlled by one of two regenerative thermal oxidizer (RTO) beds.	09-01-2001 12-19-2012	FGMACTPPPP FGCAM
EUSOLV	The Solvent emission unit includes the use of miscellaneous solvents for the following purposes: wiping parts to be coated on the Ursa Minor Dip Coat Line, cleaning the tanks for the Ursa Minor Dip Coat Line, cleaning the spray guns and cleaning the booths and equipment for the Body Color Paint Line. The RTO control system is used during the cleaning of the spray guns on EUBCPL, otherwise no control is associated with this emission unit	07-01-1997	FGMACTPPPP
EUMAINTCLEANER	Non-production parts cleaner located in the maintenance area.	07-01-1997	FGCOLDCLEANERS
EUBLACKOUT	Manual spray application booth and associated curing oven associated with the application of primer coating to plastic automotive roof panels.	08-01-2012	FGRULE287(2)(c) FGMACTPPPP

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E ' ' 11 '/ ID	F 11140. IMI-F 11-142012-2023				
Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID		
EUROOFBOND	Application of an adhesive and an associated heated press used in bonding of a metallic frame to a plastic automotive roof panel.	08-01-2012	FGRULE290 FGMACTPPPP		
EUASSEMBLY	This emission unit includes a batch assembly oven used for the annealing of plastic parts	01-01-1989	FGRULE290		
EUWASHERHEATER	2.50MMBtu/hr natural gas fired water heater	01-01-1995	FGMACTDDDDD		
EUURSAHYDRYOFFOVEN	1.65MMBtu/hr natural gas fired process heater	09-01-2001	FGMACTDDDDD		
EUURSAPRIMEOVEN	1.65MMBtu/hr natural gas fired process heater	09-01-2001	FGMACTDDDDD		
EUURSATOPCOATOVENA	1.65MMBtu/hr natural gas fired process heater	09-01-2001	FGMACTDDDDD		
EUURSATOPCOATOVENB	1.65MMBtu/Hr natural gas fired process heater	09-01-2001	FGMACTDDDDD		
EUBT1PANEL	A robotic blackout coating applicator to coat polycarbonate automotive roof panel perimeters with a 6-inch wide blackout border. The applied coating in a booth is partially captured and controlled by exhaust fans and routed to the existing Regenerative Thermal Oxidizer (RTO) at the facility. The associated purge, wipe, and cleanup operations are included.	01-06-2023	FGBT1 FGMACTPPPP		
EUBT1FRAME	Near the EUBT1PANEL booth, a separate, manual operation will apply a primer to metal roof frames within plant emissions (uncontrolled emissions). The associated wipe, purge, and clean operations are included.	01-06-2023	FGBT1 FGMACTPPPP FGRULE621		

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# EUBCPL EMISSION UNIT CONDITIONS

## **DESCRIPTION**

The Body Color Paint Line includes 5 spray booths, 5 flash off areas, an associated curing oven, and an exhaust air recirculating system for the spray booths.

Flexible Group ID: FGMACTPPPP, FGCAM

## POLLUTION CONTROL EQUIPMENT

The VOC control system consists of a Permanent Total Enclosure (PTE) for the spray booths and flash off areas, particulate exhaust filters for the spray booths, and a RTO described as Bed A and Bed B. Bed A and Bed B, each have a 25,000 scfm capacity. Typically, one bed is used at a time, while the second bed acts as a backup; however, both beds may operate at the same time. Bed A and Bed B have a common exhaust stack.

# I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	8.6 pph <sup>2</sup>	Calendar day Average	EUBCPL	SC V.1 SC V. 2 SC VI. 2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOC	37.6 tpy <sup>2</sup>	12 month rolling time period as determined at the end of each calendar month*	EUBCPL	SC V.1 SC V. 2 SC VI. 2	R 336.1205 R 336.1225 R 336.1702(a)

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUBCPL unless all 5 spray booths are equipped with an exhaust air recirculation system and this system, the 5 flash-off areas, and the curing oven are exhausted to a regenerative thermal oxidizer (RTO), and the exhaust air recirculation system and the RTO control system are installed and operating properly. Proper operation of the RTO control system is defined as maintaining a minimum operating temperature of 1400 °F and a minimum retention time of 0.5 second in each of the two thermal oxidizer beds, and achieving a minimum overall VOC control efficiency of the 95 percent for EUBCPL, based on the coating the VOC capture efficiency and VOC destruction efficiency.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)
- 2. The permittee shall not operate EUBCPL unless the PTE is installed and operating properly. Proper operation of the permanent total enclosure is described in Appendix 9:2 (R 336.1205, R 336.1225, R 336.1702(a), R336.1910)
- 3. The permittee shall monitor and record the pressure differential between the permanent total enclosure and the outside room on a continuous basis to verify that air is entering the permanent total enclosure. The permittee shall prepare and submit to the AQD Technical Programs Unit, an air pressure differential monitoring plan. The monitoring plan 2shall include a quality assurance plan stating the method proposed to calibrate/audit each monitor in order to verify the monitoring equipment has been installed and is operating properly. The monitoring plan shall be submitted to and approved by the Technical Programs Unit prior to monitoring.<sup>2</sup> (R 336.1205, R 336.1702(a), R 336.1910)

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- 4. The permittee shall operate the Body Color Paint Line with the following coating applicator equipment, or equipment with equivalent or better transfer efficiency, that is installed and operated properly:
  - a. Booth 1 Conventional hand spray applicators;
  - b. Booth 2 Electrostatic rotary atomizers with reciprocator;
  - c. Booth 3 Robot with conventional spray gun.
  - d. Booth 4 Robot with conventional spray gun/electrostatic rotary atomizers with reciprocators;
  - e. Booth 5 Robot with conventional spray gun

The permittee may utilize conventional guns in any of the booths for touchup and/or for painting parts with complex geometry. If an applicator system malfunctions, the permittee may utilize an alternate applicator for up to seven days of operation or longer if approved by the Air Quality Division District Supervisor. Records of applicator system malfunctions, including date, description, and duration of the applicator malfunction shall be kept in a format that has been approved by the Air Quality Division District Supervisor. The records shall be kept on site for a period of at least five years and made available to the Department upon request.<sup>2</sup> (R 336.1702(a), R 336.1910)

- 5. The disposal of spent filters; waste coatings, reducers, clean-up solvents, and wash solvents shall be performed in a manner that minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))
- 6. The permittee shall not operate EUBCPL unless a Malfunction Abatement Plan (MAP) as described in R 336.1911(2) has been submitted within 180 days of permit issuance and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a. A complete preventive maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of the air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.

A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request of the Air Quality Division District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the Air Quality Division District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of the submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emissions limits. (R 336.1213(3))

## See Appendix 9

# IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any spray booth unless all associated exhaust filters are in place and operating properly.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)

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## V. TESTING/SAMPLING

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

1. The VOC content of any coating as applied and as received shall be determined using Federal Reference Test Method 24. Upon prior approval of the Air Quality Division District Supervisor, the VOC content of any coating may alternatively be determined from manufacturer's formulation data.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))

- 2. The permittee shall verify the VOC emission limit specified in SC I.1 for EUBCPL, capture efficiency of EUBCPL and the destruction efficiency of the RTO control system by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60 Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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)
- 3. The permittee shall verify the VOC emission rate, capture efficiency of EUBCPL, and the destruction efficiency of the RTO at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days before testing of the time and place performance tests will be conducted. (R 336.1213(3), R 336.2001(4))

## VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a current listing from the manufacturer, of the chemical composition of each coating, reducer, catalyst, coating additive, and cleanup or purge solvent including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.<sup>2</sup> (R 336.1205, R 336.1224, 336.1225, R 336.1702(a))
- 2. The permittee shall keep the following records:
  - a. Identification and the coating category for each coating used on a calendar day basis.
  - b. The VOC content in lbs/gallon of coating (minus water), as received and as applied for each coating used.
  - c. The VOC content of reducers, catalysts, and other additives used in lbs/gallon of coating (minus water), as received.
  - d. The amount in gallons used of each coating, reducer, catalyst, and coating additive on a calendar day basis.
  - e. Hours of operation on a calendar day basis.
  - f. Average hourly VOC emission rate determined on a calendar day basis.
  - g. VOC emission calculations determining the month VOC emission rate and the 12-month rolling time average emission rate in tons per year as determined at the end of the calendar month.

The records are for the purpose of compliance determination and shall be kept in a format that has been approved by the Air Quality Division District Supervisor. The records shall be kept on site for a period of at least five years and made available to the Department upon request.<sup>2</sup> (R 336.1205, R 336.1225R, 336 1702(a))

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3. The permittee shall monitor and record the temperature at the exit of each of the two RTO combustion chambers on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. All temperature monitoring and recording equipment shall be installed, calibrated, maintained and operated according to the manufacturer's specifications. All temperature records shall be kept on file for a period of at least five years and made available to Division upon request.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)

## See Appendix 7

# VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. A report demonstrating compliance with all applicable VOC emission limits and all other restrictions specified in SC I.1 and SC I.2 shall be submitted to the Air Quality Division District Supervisor in an acceptable format within 30 days following the end of the quarter in which the data were collected.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))
- 5. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

## See Appendix 8

# VIII. STACK/VENT RESTRICTION(S)

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

	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVRTO	372	55 <sup>2</sup>	R 336.1225
				R 336.1901
				40 CFR 52.21
				(c) and (d)

# IX. OTHER REQUIREMENT(S)

NA

### Footnotes:

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

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

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# EUSOLV EMISSION UNIT CONDITIONS

## **DESCRIPTION**

This emission unit includes the use of miscellaneous solvents for all process at the facility for the following processes: wiping parts to be coated on the Ursa Minor Dip Coat Line; cleaning the tanks for the Ursa Minor Dip Coat Line; purging spray guns and cleaning booths and equipment for the Body Color Paint Line.

Flexible Group ID: FGMACTPPPP

## POLLUTION CONTROL EQUIPMENT

When purging the spray guns the VOC Control system consists of a Permanent Total Enclosure (PTE) for the spray booths and flash off areas, particulate exhaust filters for the spray booths, and an RTO described as Bed A and Bed B. Bed A and Bed B, each have a 25,000 scfm capacity. Typically, one bed is used at a time, while the second bed acts as a backup; However, both beds may operate at the same time. Bed A and Bed B have a common exhaust stack. The remaining processes are uncontrolled.

## I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	VOC	7.8 pph <sup>2</sup>	Calendar month average	EUSOLV	SC VI.2 SC VII.4	R 336.1205 R 336.1225 R 336.1702(a)
2.	VOC	20 tons/year <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUSOLV	SC VI.2 SC VII.4	R 336.1205 R 336.1225 R 336.1702(a)

## II. MATERIAL LIMIT(S)

NA

# III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The following VOC control measures shall be applied to the use of miscellaneous solvents:<sup>2</sup> (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 366.1910)
  - a. Operation of the RTO control system during purging of spray guns on EUBCPL.
  - b. Capture of all line purge materials followed by storage in closed containers and disposal in an acceptable manner in compliance with all applicable state rules and federal regulations.
  - c. Storage in closed containers of the following: solvent-laden rags from parts wiping, solvent-laden rags and waste clean-up solvent and residue from cleaning of spray booths, dip tanks, or other equipment. These materials shall be reclaimed, recycled, or disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.
- 2. The disposal of spent filters; waste coatings, reducers, clean-up solvents, and wash solvents shall be performed in a manner that minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1205, R 336.1702(a))

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

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NA

## V. TESTING/SAMPLING

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

NA

# VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain a current listing from the manufacturer, of the chemical composition of each cleanup or purge solvent including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.<sup>2</sup> (R 336.1205, R 336.1224, 336.1225, R 336.1702(a))
- 2. The permittee shall keep the following information for the use of clean-up and purge solvent:
  - Solvent identification and usage amount in gallons for each clean-up and purge solvent used on a calendar month basis.
  - b. Amount reclaimed in gallons for each clean-up and purge solvent on a calendar month basis.
  - c. VOC Content in lbs/gallon of coating (minus water), as used, and the density of each clean-up and purge solvent, in lbs/gallon.
  - d. Average hourly VOC emission rate determined on a calendar month basis.
  - e. Mass emissions calculations determining VOC calendar monthly emission rates in tons per month for all clean-up and purge solvents combined.
  - f. Mass emission calculations determining the VOC annual emission rates in tons per 12-month rolling time period as determined at the end of each calendar month for all clean-up and purge solvents combined.

The records are for the purpose of compliance determination and shall be kept in a format that has been approved by the Air Quality Division District Supervisor. The records shall be kept onsite for a period of at least five years and made available to the department upon request.<sup>2</sup> (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))

- 3. When purging spray guns, the permittee shall monitor and record on a continuous basis, and in a manner and with instrumentation acceptable to the AQD, the combustion chamber temperature of the RTO during operation of EUSOLV. All temperature records shall be made available to the AQD upon request. (R 336.1213(3))
- 4. When purging spray guns, the permittee shall continuously monitor the differential pressure between the inside of the PTE and the outside of the enclosure. (R 336.1213(3))

## See Appendix 7

## VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. A report demonstrating compliance with all applicable VOC emission limits and all other restrictions specified in SC I.1 and SC I.2 shall be submitted to the Air Quality Division District Supervisor in an acceptable format within

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30 days following the end of the quarter in which the data were collected.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))

# VIII. STACK/VENT RESTRICTION(S)

NA

# IX. OTHER REQUIREMENT(S)

NA

# Footnotes:

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

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

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# EUURSAMINOR EMISSION UNIT CONDITIONS

# **DESCRIPTION**

Surface coating of Automotive Plastic Parts: The Ursa Minor Dip Coat Line includes two dip tanks, each with an associated curing oven. The dip tanks exhaust to a Permanent Total Enclosure (PTE) which is controlled by one of two Regenerative Thermal Oxidizers (RTOs).

Flexible Group ID: FGMACTPPPP, FGCAM

## POLLUTION CONTROL EQUIPMENT

The VOC Control system consists of a Permanent Total Enclosure (PTE) for two dip tank rooms and an RTO described as Bed A and Bed B. Bed A and Bed B, each have a 25,000 scfm capacity. Typically, one bed is used at a time, while the second bed acts as a backup; however, both beds may operate at the same time. Bed A and Bed B have a common exhaust stack.

## I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	14.9 pph <sup>2</sup>	hourly	EUURSAMINOR	SC V.2	R 336.1205 R 336.1702(a)
2. VOCs	29.7 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUURSAMINOR	SC V.1 SC V.2 SC VI.3	R 336.1205 R 336.1702(a)

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.<sup>2</sup> (R 336.1702(a))
- 2. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))
- 3. The permittee shall maintain a minimum of 0.007 inches of water pressure differential between the PTE for the two dip tanks and the adjacent area on a continuous basis.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a))
- 4. The permittee shall not operate EUURSAMINOR unless a Malfunction Abatement Plan (MAP) as described in R 336.1911(2) has been submitted within 180 days of permit issuance and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a. A complete preventive maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of the air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.

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b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.

- c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
- d. A description of the procedures to capture, handle, and disposal of all material to minimize the generation for fugitive emissions per SC III.1 and SC III.2

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request of the Air Quality Division District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the Air Quality Division District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of the submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emissions limits.2 (R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)

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

- 1. The permittee shall not operate the two dip tanks in EUURSAMINOR unless an RTO control system is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the RTO control system includes a VOC capture efficiency of 90% (by weight), a minimum VOC destruction efficiency of 95% (by weight), a minimum temperature of 1400°F, a minimum retention time of 0.5 seconds, and operating and maintaining the control device with an approved MAP as required by SC III.4.2 (R 336.1205, R 336.1225, R 336.1702, R 336.1910)
- 2. The permittee shall not operate EUURSAMINOR unless the PTE for the two dip tanks is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining the PTE in accordance with an approved MAP as required in SC III.4.2 (R 336.1205, R 336.1225, R 336.1702(a))

## V. TESTING/SAMPLING

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

- 1. The permittee shall determine the VOC content, water content, and density of any coating as received, using federal Reference Test Method 24 or from manufacturers formulation data. If the Method 24 and the formulation values should differ, the permittee shall use Method 24 results to determine compliance. The coatings shall be tested once per calendar year or as soon as new coatings are put into regular use.2 (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))
- 2. The permittee shall verify the VOC emission limit specified in SC I.1 for EUURSAMINOR, the capture efficiency of EUURSAMINOR, and the destruction efficiency of the RTO control system, by testing at the owner's expense, in accordance with Department requirements. The permittee must complete the testing once every five years. No less than 90 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. Verification of the VOC emission limit, the capture, and the destruction efficiency of the control system include the submittal of a complete report of the last test results to the AQD Technical Programs Unit and District Office within 60 days following the last day of the test.2 (R 336.1205, R 336.1702(a), R 336.2040(5))
- 3. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
VOC	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. Any modifications to the method in the test protocol that are proposed after initial submittal must be approved by AQD prior to testing. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

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## VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702)

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturers formulation data, or both as deemed acceptable b the Air Quality Division District Supervisor. The permittee shall keep all records on file and make available to the Department upon request.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a calendar month basis for the EUURSAMINOR:
  - a. Gallons (minus water) of each material used
  - b. VOC content (minus water) of each material as received
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month

The permittee shall keep the records in a format acceptable to the Air Quality Division District Supervisor and make them available to the department upon request.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702)

- 4. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a temperature monitoring device to monitor and record the center bed temperature in the RTO on a continuous basis, during operation of EUURSAMINOR. The permittee shall keep, in a satisfactory manner, continuous records of the center bed temperature of the RTO. The permittee shall keep the records in a format acceptable to the Air Quality Division District Supervisor and make them available to the department upon request.<sup>2</sup> (R 336.1225, R 336.1299, R 336.1702)
- 5. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a differential pressure monitoring device to monitor and record the differential pressure between the PTE and the adjacent area on a continuous basis, during operation of EUURSAMINOR. The permittee shall keep, in a satisfactory manner, continuous records of the pressure differential between the PTE for the two dip tanks and the adjacent area. The permittee shall keep the records in a format acceptable to the Air Quality Division District Supervisor and make them available to the department upon request.<sup>2</sup> (R 336.1225, R336.1299, R 336.1702(a))

## See Appendix 7

## VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit the records required in SC VI.3 on a quarterly basis, within 30 days following the end of the quarter, in a format acceptable to the Air Quality Division District Supervisor.<sup>2</sup> (R 336.1205, R 336.1702)

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

## See Appendix 8

# VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-RTO	37.02	55.0 <sup>2</sup>	R 336.1225
			R 336.1901
			R 336.2803
			R 336.2804
			40 CFR 52.21 (c) and (d)
2. SV-PRIMEOVEN	11.0 <sup>2</sup>	39.0 <sup>2</sup>	R 336.1225
			R 336.1901
			R 336.2803
			R 336.2804
			40 CFR 52.21 (c) and (d)
3. SV-TOPCOATOVEN	14.0 <sup>2</sup>	39.0 <sup>2</sup>	R 336.1225
			R 336.1901
			R 336.2803
			R 336.2804
			40 CFR 52.21 (c) and (d)

# IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for surface coating of Plastic Parts and Products by the initial compliance date.<sup>2</sup> (40 CFR Part 63, Subpart A and Subpart PPPP)

# Footnotes:

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

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

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# 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
FGCAM	40 CFR Part 64 (CAM Rule) requirements for RTO and PTE	EUBCPL EUURSARMINOR
FGMACTPPPP	Each existing affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.	EUBCPL EUURSARMINOR EUSOLV EUBLACKOUT EUROOFBOND EUBT1PANEL EUBT1FRAME
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUMAINTCLEANER
FGRULE287(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.	EUBLACKOUT
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EUROOFBOND EUASSEMBLY
FGMACTDDDDD	Requirements for existing boilers and process heaters with a heat input capacity of <10 MMBTU/hr for major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). These boilers or process heaters are designed to burn solid, liquid, or gaseous fuels.	EUWASHERHEATER EUURSADRYOFFOVEN EUURSAPRIMEOVEN EUURSATOPCOATOVENA EUURSATOPCOATOVENB

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBT1	A robotic blackout coating application to coat polycarbonate automotive roof panel perimeters with a 6-inch wide blackout boarder. The applied coating in a booth is partially captured and controlled by two exhaust fans and routed to the existing RTO at the facility. Near the EUBT1PANEL booth, a separate, manual operation will apply a primer to metal roof frames with in-plant emissions (uncontrolled emissions). The associate purge, wipe, and cleanup operations are included.	
FGRULE621	All metal parts coating lines source wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b)	EUBT1FRAME

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# FGCAM FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

40 CFR Part 64 (CAM Rule) requirements for RTO and PTE.

Emission Units: EUBPCL, EUURSAMINOR

## POLLUTION CONTROL EQUIPMENT

The VOC control system consists of a Permanent Total Enclosure (PTE) for the spray booths and flash off areas, particulate exhaust filters for the spray booths, and an RTO described as Bed A and Bed B. Bed A and Bed B, each have a 25,000 SCFM capacity. Typically, one bed is used at a time, while the second bed acts as a backup, however both beds may operate at the same time. Bed A and Bed B have a common exhaust stack.

## I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

NA

# III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

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

NA

### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall continuously monitor combustion chamber temperature and record every 15 minutes as an indicator of proper operation of the RTO. The indicator range is a minimum combustion chamber temperature of 1,400° F or the average combustion temperature maintained during the last approved and passing destruction efficiency stack test performed, whichever is higher. (40 CFR 64.6(c)(1)(i) and (ii))
- 2. The permittee shall evaluate the capture efficiency of the capture system by monitoring the differential pressure between the inside of each line PTE and the outside across the enclosure. This shall be recorded continuously at one-minute intervals on a data acquisition system or other method and manually logged once per day. The indicator range is a differential pressure between the inside of each line PTE and the outside of greater than 0.007 inches of Water Column (WC). (40 CFR 64.3(a)(2))

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3. For each control device in operation, the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was opened and the length of time the bypass line was opened shall be kept on file. (40 CFR 64.3(a)(2))

- 4. The temperature monitors and the pressure gauges shall continuously monitor the RTO combustion chamber temperatures and the PTE differential pressures, respectively. The averaging period is 3-hours for both parameters. The monitors shall be calibrated annually or per manufacturer specifications, whichever is more frequent. (40 CFR 64.6(c)(1)(iii))
- 5. An excursion for the RTO combustion temperature is a 3-hour average temperature below 1400°F or the average combustion temperature maintained during the last approved and passing destruction efficiency stack test performed, whichever is higher and an excursion for the PTE differential pressure is a differential pressure less than 0.007" WC. (40 CFR 64.6(c)(2))
- 6. 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. When the center-bed temperature falls below the minimum operating temperature, an alarm notifies the operator of the temperature excursion. The follow up actions for the temperature and differential pressure excursions will be decided by the operator and the management based on the nature of the cause of the excursion. (40 CFR 64.7(d))
- 7. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 8. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))
- 9. 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))

## 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))

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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

# VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

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

## Footnotes:

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

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

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# FGMACTPPPP FLEXIBLE GROUP CONDITIONS

# **DESCRIPTION**

Each existing affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.

**Emission Units:** EUBCPL, EUURSAMINOR, EUSOLV, EUBLACKOUT, EUROOFBOND, EUBT1PANEL, EUBT1FRAME

## POLLUTION CONTROL EQUIPMENT

PTE and RTO

# I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating	Equipment	Monitoring/	Underlying
			Scenario		<b>Testing Method</b>	Applicable
						Requirements
1.	Organic HAP	0.16 lb per lb	12-month rolling time	Existing - General	SC V.1	40 CFR
		of coating	period as determined at	Use Coating	SC V.2	63.4490(a)(1)
		solids	the end of each calendar		SC VI.1 through	
			month		SC VI.9	

- 2. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.4490 using at least one of the following three options, which are listed in 40 CFR 63.4491(a) through (c):
  - a. Compliant material option,
  - b. Emission rate without add-on controls option, or
  - c. Emission rate with add-on controls option.

The permittee shall include all coatings, thinners and/or other additives, and cleaning materials used when determining the emission rate. (40 CFR 63.4491)

- 3. Any coating operation(s) using the compliant material option, the emission rate without add-on controls option, or the emission rate with add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.4490 at all times. (40 CFR 63.4500(a)(1), 40 CFR 63.4500(a)(2)(i))
- 4. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.4490(a) or (b), the permittee may comply separately with each subcategory emission limit or comply using one of the alternatives in 40 CFR 63.4490(c)(1) or (2). **(40 CFR 63.4490(c))**
- 5. The permittee may calculate and comply with a facility-specific emission limit as described in 40 CFR 63.4490(c)(2)(i) through (iii). If the permittee elects to comply using the facility-specific emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this and other applicable surface coating NESHAP. In calculating a facility-specific emission limit, include coating activities that meet the applicability criteria of the other subcategories and constitute more than 1% of total coating activities. (40 CFR 63.4490(c)(2))

# II. MATERIAL LIMIT(S)

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For the compliant materials option, the permittee shall meet the material limits specified in the following table.

	Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Each Thinner	No Organic	Continuous	Each Coating	SC VI.1	40 CFR
	and/or Additive	HAP *		Operation using	SC VI.2	63.4491(a)
				Compliant Material	SC VI.3	, ,
				Option	SC VI.5	
2.	Each Cleaning	No Organic	Continuous	Each Coating	SC VI.1	40 CFR
	Material	HAP *		Operation using	SC VI.2	63.4491(a)
				Compliant Material	SC VI.3	, ,
				Option	SC VI.5	

<sup>\*</sup> Determined according to 40 CFR 63.4541(a).

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. (40 CFR 63.4500(b))
- 2. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The work practice plan shall specify practices and procedures to ensure, at a minimum, the following elements are implemented:
  - a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers. (40 CFR 63.4493(b)(1))
  - b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized. (40 CFR 63.4493(b)(2))
  - c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials and waste materials must be conveyed from one location to another in closed containers or pipes. (40 CFR 63.4493(b)(3))
  - d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents. (40 CFR 63.4493(b)(4))
  - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment. (40 CFR 63.4493(b)(5))
- 3. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.4492 at all times except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.4561(j). (40 CFR 63.4500(a)(2)(ii))
- 4. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the work practice standards in 40 CFR 63.4493 at all times. (40 CFR 63.4500(a)(2)(iii))

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart PPPP as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.4567. The permittee must meet the operating limits at all times after established. (40 CFR 63.4492(b), 40 CFR Part 63, Subpart PPPP, Table 1)

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Add-on Control Device	Operating Limit		
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.4567(a).		
Emission capture system that is a PTE according to 40 CFR 63.4565(a)	<ul><li>a. The direction of the air flow at all times must be into the enclosure; and either</li><li>b. The average facial velocity of air through all-natural draft openings in the enclosure must be at least 200 feet per minute; or</li></ul>		
	c. The pressure drop across the enclosure must be at least 0.007 inches H <sub>2</sub> O, as established in Method 204 of Appendix M OF 40 CFR Part 51.		

## V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.4531)

- 1. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the organic HAP content of each coating used in accordance with 40 CFR 63.4541, 40 CFR 63.4551, and/or 40 CFR 63.4561. (40 CFR 63.4541, 40 CFR 63.4551, 40 CFR 63.4561)
- 2. For any coating operation(s) using the emission rate with add-on controls option, the permittee must conduct each performance test required by 40 CFR 63.4560 according to the requirements in 40 CFR 63.4564(a)(1) and (2). (40 CFR 63.4560)
- 3. The permittee shall conduct each performance test of an emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.4565 and 40 CFR 63.4566. 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. 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 336.2002, R 336.2003, 40 CFR 63.4564(a) and (b))

## VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.4531)

- 1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.4541, 40 CFR 63.4551, or 40 CFR 63.4561. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4483 and ends on the last day of the 12<sup>th</sup> month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months. (40 CFR 63.4483, 40 CFR 63.4540, 40 CFR 63.4560)
- 2. The permittee shall keep all records required by 40 CFR 63.4530 in the format and timeframes outlined in 40 CFR 63.4531. (40 CFR 63.4542(d), 40 CFR 63.4552(d), 40 CFR 63.4563(j))
- 3. The permittee shall maintain, at a minimum, the following records for each compliance period:
  - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart PPPP, and the documentation supporting each notification report. (40 CFR 63.4530(a))
  - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. (40 CFR 63.4530(b))
  - c. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. (40 CFR 63.4530(c)(1))
  - d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. (40 CFR 63.4530(c)(2))

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e. For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. (40 CFR 63.4530(c)(3))

- For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.4530(c)(4)(i) through (v). (40 CFR 63.4530(c)(4))
- g. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. (40 CFR 63.4530(d))
- h. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period. (40 CFR 63.4530(e))
- The mass fraction of coating solids for each coating used during each compliance period. (40 CFR 63.4530(f))
- The information specified in 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4). (40 CFR 63.4530(g))
- k. For each deviation from an emission limitation reported under 40 CFR 63.4520(a)(5) through (7), a record of the information specified in 40 CFR 63.4530(h)(1) through (4), as applicable. (40 CFR 63.4530(h))
- For the emission rate with add-on controls option, records specified in 40 CFR 63.4530(i)(1) through (8). (40 CFR 63.4530(i))
- 4. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 to 40 CFR Part 63, Subpart PPPP using the applicable method(s) described below: (40 CFR 63.4563(c))

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.4567(a).	<ul> <li>i. Collect the combustion temperature data according to 40 CFR 63.4568(c);</li> <li>ii. Reduce the data to 3-hour block averages; and</li> <li>iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.</li> </ul>
Emission capture system that is a PTE according to 40 CFR 63.4565(a)	<ul> <li>a. The direction of the air flow at all times must be into the enclosure;</li> <li>b. The average facial velocity of air through all-natural draft openings in the enclosure must be at least 200 feet per minute</li> </ul>	i. Collect the direction of air flow, and either the facial velocity of air through all-natural draft openings according to 40 CFR 63.4568(g)(1) or the pressure drop across the enclosure according to 40 CFR 63.4568(g)(2); and
	OR  c. The pressure drop across the enclosure must be at least 0.007 inches H <sub>2</sub> O, as established in Method 204 of Appendix M of 40 CFR Part 51.	ii. Maintain the facial velocity of air flow through all-natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit and maintain the direction of air flow into the enclosure at all times.

5. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, using Equation

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1 of 40 CFR 63.4541. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.4541(a). (40 CFR 63.4542(a))

- 6. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, according to 40 CFR 63.4551(a) through (g). (40 CFR 63.4552(a))
- 7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, according to the procedures in 40 CFR 63.4561. (40 CFR 63.4563(a))
- 8. During the performance test required by 40 CFR 63.4560, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.4567 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.4492. (40 CFR 63.4567)
- 9. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.4568(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.4568(b). (40 CFR 63.4568)

## 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. For the compliant material option, the permittee shall report a deviation, as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5), for the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a). (40 CFR 63.4542(b))
- 5. For the emission rate without add-on controls, the permittee shall report a deviation, as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6), if the organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490. (40 CFR 63.4552(b))
- 6. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(7):
  - a. The organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490; (40 CFR 63.4563(b))
  - b. An operating parameter is out of the allowed range; (40 CFR 63.4563(c)(1))
  - c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened; (40 CFR 63.4563(d))
  - d. Deviations from work practice standards occur. (40 CFR 63.4563(e))
- 7. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.4510. (40 CFR Part 63, Subparts A and PPPP)
- 8. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating

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operations were in compliance. (40 CFR 63.4520(a), 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f))

- 9. The permittee must submit the following:
  - a. Within 60 days after the date of completing each performance test for emission capture systems and add-on control devices, the results of the performance tests required by 40 CFR Part 63, Subpart PPPP to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's Central Data Exchange (CDX) (<a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>). Performance test data must be submitted in the file format generated through use of the USEPA's Electronic Reporting Tool (ERT) (see <a href="https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert">https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert</a>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website. For data collected using test methods not listed on the ERT Website, the permittee must submit the results of the performance test to the USEPA at the appropriate address listed in 40 CFR 63.13. (40 CFR 63.4520(b) and (d))
  - b. Initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in 40 CFR 63.9(h) and 40 CFR 63.4510(c) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>). The permittee must upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF). The applicable notification must be submitted by the deadline specified in this subpart, regardless of the method in which the reports are submitted. (40 CFR 63.4520(e))
  - c. On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for 1-year, whichever date is later, the semiannual compliance report required in 40 CFR 63.4520(a) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<a href="https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri">https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri</a>). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year begin submitting all subsequent reports via CEDRI. (40 CFR 63.4520(f))
- 10. The permittee must report the results of performance tests for emission capture systems and add-on control devices within 60 days after the completion of the performance tests. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office in a format approved by the AQD. (R 336.2001(5), 40 CFR 63.4520(b))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

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# 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 PPPP for Surface Coating of Plastic Parts and Products. (40 CFR Part 63, Subparts A and PPPP)

## Footnotes:

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

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

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# FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

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

FGCOLDCLEANERS contains the non-production parts cleaner located in the maintenance area.

**Emission Unit:** EUMAINTCLEANER

## **POLLUTION CONTROL EQUIPMENT**

NA

## I. EMISSION LIMIT(S)

NA

#### II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (R 336.1213(2))

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))
- 2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

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

- 1. The cold cleaner must meet one of the following design requirements:
  - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(2)(h))
  - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(2)(r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
- 3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))
- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

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- a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))
- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

#### V. TESTING/SAMPLING

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

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
  - a. A serial number, model number, or other unique identifier for each cold cleaner.
  - b. The date the unit was installed, manufactured or that it commenced operation.
  - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
  - d. The applicable Rule 201 exemption.
  - e. The Reid vapor pressure of each solvent used.
  - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

#### VII. REPORTING

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

See Appendix 8

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## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

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# FGRULE287(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: NA

Emission Units installed prior to December 20, 2016: EUBLACKOUT

#### **POLLUTION CONTROL EQUIPMENT**

NA

## 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 <u>on or after</u> 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 <u>before</u> 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))

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#### 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))

#### See Appendix 4

#### VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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# FGRULE290 FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

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

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016: EUROOFBOND, EUASSEMBLY

#### **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 CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(2)(a)(ii))
  - a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(2)(a)(ii)(A))
  - b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(2)(a)(ii)(B))
  - c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (R 336.1290(2)(a)(ii)(C))
  - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. (R 336.1290(2)(a)(ii)(D))
  - e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. (R 336.1290(2)(a)(ii)(E))
- 3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: (R 336.1290(2)(a)(iii))
  - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(2)(a)(iii)(A))
  - b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. (R 336.1290(2)(a)(iii)(B))

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c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(2)(a)(iii)(C))

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

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

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

NA

#### V. TESTING/SAMPLING

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

NA

## VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. (R 336.1213(3))
  - a. Records identifying each air contaminant that is emitted. (R 336.1213(3))
  - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))
  - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. (R 336.1213(3))
  - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). (R 336.1213(3))
  - e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in enough detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering

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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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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# FGMACTDDDDD FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Requirements for existing boilers and process heaters with a heat input capacity of <10 MMBTU/hr for major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). These boilers or process heaters are designed to burn solid, liquid, or gaseous fuels.

#### **Emission Units:**

Equal to or less than 5 MMBTU/hr	EUWASHERHEATER
and only burns gaseous or light	EUUSRADRYOFFOVEN
liquid fuels	EUURSAPRIMEOVEN
·	EUURSATOPCOATOVENA
	EUURSATOPCOATOVENB
Greater than 5 MMBTU/hr and less	NA
than 10 MMBTU/hr that burns	
gaseous or light liquid fuels or any	
unit that is less than 10 MMBTU/hr	
and burns any heavy liquid or solid	
fuels	

## **POLLUTION CONTROL EQUIPMENT**

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

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

- 1. The permittee must, for boilers or process heaters with a heat input capacity of less than or equal to 5 MMBTU/hr, conduct a 5-year tune-up according to 40 CFR 63.7540(a)(12). Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. The burner inspection may be delayed until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months. (40 CFR 63.7500(d) or (e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12), 40 CFR Part 63, Subpart DDDDD, Table 3.1)
- 2. The permittee must conduct a tune-up of each boiler or process heater as specified in the following: (40 CFR 63.7540(a)(11) or (12))
  - a. As applicable, inspect the burner and clean or replace any components of the burner as necessary. The permittee may perform the burner inspection any time prior to the tune-up or may delay the burner inspection until the next scheduled unit shutdown. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))

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c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The permittee may delay the inspection until the next scheduled unit shutdown. (40 CFR 63.7540(a)(10)(iii))

- d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject. (40 CFR 63.7540(a)(10)(iv))
- e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. (40 CFR 63.7540(a)(10)(v))
- 3. If the unit is not operated on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. (40 CFR 63.7540(a)(13))
- 4. At all times, the permittee must operate and maintain each existing small boiler or process heater, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.7500(a)(3))

## IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

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

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or 2- or 5-year compliance report or one-time energy assessment, as applicable, that the permittee submitted. (40 CFR 63.7555(a)(1))
- 2. The permittee must keep the records in a form suitable and readily available for expeditious review. (40 CFR 63.7560(a))
- 3. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63.7560(b))
- 4. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. (40 CFR 63.7560(c))

#### VII. REPORTING

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

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3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

- 4. The permittee must submit boiler or process heater tune-up compliance reports to the appropriate AQD District Office and must be postmarked or submitted by March 15<sup>th</sup> of the year following the applicable 2 or 5-year period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to EPA Region 5. (40 CFR 63.7550(b), 40 CFR 63.7550(h)(3))
- 5. The permittee must include the following information in the compliance report. (40 CFR 63.7550(c)(1))
  - a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
  - b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
  - c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
  - d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done biennially or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
  - e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.7550(c)(5)(xvii))

#### See Appendix 8

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters. (40 CFR Part 63, Subparts A and DDDDD)

#### 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).

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# FGBT1 FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

A robotic blackout coating applicator to coat polycarbonate automotive roof panel perimeters with a 6-inch-wide blackout border. The applied coating in a booth will be partially captured and controlled by two exhaust fans and routed to the existing Regenerative Thermal Oxidizer (RTO) at the facility. Near the EUBT1PANEL booth, a separate, manual operation will apply a primer to metal roof frames with in-plant emissions (uncontrolled emissions). The associated purge, wipe, and cleanup operations are included.

Emission Units: EUBT1PANEL, EUBT1FRAME

#### POLLUTION CONTROL EQUIPMENT

For EUBT1PANEL: An existing Regenerative Thermal Oxidizer (RTO) to control VOC emissions

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Test Method	Underlaying Applicable Requirements
1. VOC	5.2 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each month	EUBT1PANEL*	SC VI.3	R 336.1702(a)
2. VOC	2,000 lb per month <sup>2</sup>	Each calendar month	EUBT1FRAME*	SC VI.3	R 336.1702(d)
3. VOC	1.3 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each month	EUBT1FRAME*	SC VI.3	R 336.1702(d)

<sup>\*</sup> includes purge, wipe, and clean up solvents

#### II. MATERIAL LIMIT(S)

1. The permittee shall not use more than 100 gallons per year of purge, wipe, and clean up solvents based on a 12-month rolling time period as determined at the end of each calendar month.<sup>1</sup> (R 336.1224, R 336.1225(1))

## III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall capture all waste primer, coating, purge, and clean up solvents, etc. (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a))
- 2. The permittee shall handle all VOC and HAP containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.<sup>2</sup> (R 336.1225, R 336.1702(a))
- 3. The permittee shall not operate EUBT1PANEL unless a MAP for the RTO, as described in Rule 911(2) is submitted, implemented, and maintained within 60 days from commencement of trial operation of EUBT1PANEL. The MAP shall, at a minimum, specify the following:

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a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.

- b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
- d. A description of the procedures to capture, handle, and dispose of all materials to minimize the generation of fugitive emissions per SC numbers III.1 and III.3.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)

## IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall equip and maintain EUBT1PANEL with robotic brush applicators or comparable technology with equivalent transfer efficiency.2 (R 336.1702(a))
- 2. The permittee shall equip and maintain EUBT1FRAME with manual wipe applicators or comparable technology with equivalent transfer efficiency.<sup>2</sup> (R 336.1702(a))
- 3. The permittee shall not operate EUBT1PANEL unless the RTO is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 70 percent (by weight) for EUBT1PANEL, minimum VOC destruction efficiency of 95 percent (by weight) and maintaining a minimum operating temperature of 1400°F, and a minimum retention time of 0.5 seconds, and operating and maintaining the control device with an approved MAP as required by SC III.4.2 (R 336.1225, R 336.1702(a), R 336.1910)
- 4. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner acceptable to the AQD District Supervisor, a temperature monitoring device in the RTO to monitor and record the temperature, on a continuous basis, during operation of EUBT1PANEL.2 (R 336.1225, R 336.1702(a))

## V. TESTING/SAMPLING

- 1. The permittee shall determine the VOC content, water content, and density of any coating, as applied and as received, using Federal Reference Test Method 24. Upon written approval by the AQD District Supervisor, the permittee may determine the VOC content from the manufacturer's formulation data. If the Method 24 and formulation values should differ, the permittee shall use the Method 24 results to determine compliance.2 (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))
- 2. Within 180 days from the commencement of trial operations of EUBT1PANEL, the permittee shall verify the destruction efficiency of the RTO, by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR part 60, Appendix A. An alternate method, or a modification to the approved EPA Method may be specified in an AQD approved test protocol and must meet the requirements of the Federal Clean Air Act, all applicable State and Federal rules and regulations, and be within the authority of the AQD to make the change. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol

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that are proposed after initial submittal. The permittee must submit a complete test report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.2 (R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)

- 3. Within 180 days from the commencement of trial operations of EUBT1PANEL, the permittee shall verify the capture efficiency of the RTO, by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR part 60, Appendix A. An alternate metho, or a modification to the approved EPA Method may be specified in an AQD approved test protocol and must meet the requirements of the Federal Clean Air Act, all applicable State and Federal rules and regulations, and be within the authority of the AQD to make the change. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete test report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.2 (R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall verify the destruction efficiency and capture efficiency of the RTO, at a minimum, every five years from the date of the last test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days before testing of the time and place performance tests will be conducted. (R 336.1213(3), R 336.2001(4))

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a))
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (primer, coating, purge and clean up solvents, etc.), including the weight of each component. The data may consist of Material Safety Data Sheets, manufacturers formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1224, R 336.1225, R 336.1702(a))
- 3. The permittee shall keep the following information for EUBT1PANEL and EUBT1FRAME, each separately:
  - a. Gallons (with water and exempt solvents) of each VOC containing primer, coating, wipe, purge, and clean solvents, etc. (material) used on a monthly basis.
  - b. VOC content (with water and exempt solvents) of each material, as applied, on a monthly basis.
  - c. VOC mass emission calculations determining the following:
    - The monthly emission rate in pounds per calendar month for EUBT1FRAME
    - ii. The monthly emission rate in tons per calendar month for EUBT1FRAME and EUBT1PANEL.
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for EUBT1PANEL and EUBT1FRAME.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1702(a))

4. The permittee shall monitor and record, in a satisfactory manner, the temperature in the RTO, on a continuous basis, during operation of EUBT1PANEL. The temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702)

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5. The permittee shall keep records of the test results for SC V.2 and SC V.3 (destruction efficiency of RTO and capture efficiency of EUBT1PANEL). The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702(a))

## **VII. REPORTING**

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

## 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. SVRTO	372	55²	40 CFR 52.21 (c) and (d)

The exhaust gases from EUBT1FRAME shall be released only into the general in-plant environment.<sup>2</sup> (40 CFR 52.21 (c)&(d))

#### IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products by the initial compliance date as applies to EUBT1PANEL.<sup>2</sup> (40 CFR Part 63, Subpart A and Subpart PPPP)
- 2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date as applies to EUBT1FRAME.<sup>2</sup> (40 CFR Part 63, Subpart A and Subpart MMMM)

## 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).

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# FGRULE621 FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

All metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b).

**Emission Unit:** EUBT1FRAME

## **POLLUTION CONTROL EQUIPMENT**

NA

## I. <u>EMISSION LIMIT(S)</u>

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Test Method	Underlaying Applicable Requirements
1. VOC	30.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each month	FGRULE621	SC VI.3	R 336.1702(d)

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL LIMIT(S)

NA

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

NA

#### V. TESTING/SAMPLING

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1702)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturers formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1702)
- 3. The permittee shall keep the following information on a calendar month basis for all metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621 (10)(b):

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- a. Gallons (with water and exempt solvents) or pounds of each VOC containing coating used and/or reclaimed.
- b. VOC content (with water and exempt solvents) of each coating as applied.
- c. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.
- d. VOC mass emission calculation determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1702(d))

## VII. REPORTING

NA

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

NA

#### Footnotes:

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

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

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## 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).

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## **APPENDICES**

Appendix 1. Acronyms and Abbreviations

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

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

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## Appendix 2. Schedule of Compliance

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

#### **Appendix 3. Monitoring Requirements**

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

### Appendix 4. Recordkeeping

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

## **Appendix 5. Testing Procedures**

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

### Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N2812-2015b. 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-N2812-2015b is being reissued as Source-Wide PTI No. MI-PTI-N2812-2023.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201700049	Update ROP to correct language that was included from PTI 397-94E. Update the VOC destruction and capture efficiencies to permitted Conditions from PTI 397-94E in EUURSAMINOR that were missed while incorporating the PTI into the existing ROP.	EUURSAMINOR
NA	201700093	Replace typo from recent Minor Modification (MI-ROP-N2812-2015a) that was issued. Corrected the term "control efficiency" to "capture efficiency" in Condition III.11 in EUURSAMINOR. Additionally, LexaMar Corporation requested to have Rule 336.1299 removed as an underlying applicable requirement because it was rescinded.	EUURSAMINOR
PTI 397-94F		Added new process for roof panel that includes a small metal part and adds 40 CFR Part 63, Subpart MMMM for FGBT1	EUBT1PANEL EUBT1FRAME

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## **Appendix 7. Emission Calculations**

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUBCPL, EUURSAMINOR, and EUSOLV

## **EUBCPL**

## **VOC Emission Calculations:**

lbs VOC/hr = 
$$\left\{ \left[ \sum_{i=1}^{i=n} (V_i \times Y_i) \right] \times \frac{1 \, day}{h} \right\} \times (1 - CE \cdot DE)$$

$$tonsVOC/year = \sum_{k=1}^{k=12} \left[ \sum_{i=1}^{i=n} (v_i \times Y_i) \right]_k \times (1 - CE \cdot DE) \times \frac{1 ton}{2000 lbs}$$

Where:

i = Product "i" varies from 1 to n for EGBCPL.

k = Month 1 through 12.

V<sub>i</sub> = Gallons of coating and/or reducer "i" (minus water), as applied, used during the time period (i.e. one day).

v<sub>i</sub> = Gallons of coating and/or reducer "i" (minus water), as applied, used during the time period (i.e. one month).

Y<sub>i</sub> = Pounds of VOC per gallon of coating and/or reducer "i" (minus water), as applied.

h = Daily hours of operation for EGBCPL.

CE = Capture Efficiency.
DE = Destruction Efficiency.

## **EUURSAMINOR**

## **VOC Emission Calculations:**

$$lbs \ VOC/hr = \sum_{i=1}^{i=n} \left[ \left( V_U - V_R \right)_i \times Y_i \right] \times \frac{1 \, day}{h} \times (1 - CE \cdot DE)$$

tons VOC/month = 
$$\left[\sum_{i=1}^{i=n} \left[ \left( v_{U} - v_{R} \right)_{i} \times Y_{i} \right] \right] \times (1 - CE \cdot DE) \times \frac{1 \text{ ton}}{2000 \text{ lbs}}$$

$$tonsVOC/year = \sum_{k=1}^{k=12} \left[ \sum_{i=1}^{i=n} [(v_U - v_R)_i \times Y_i] \right]_k \times (1 - CE \cdot DE) \times \frac{1 ton}{2000 lbs}$$

Where:

= Product "i" varies from 1 to n for EGURSAMINOR.

k = Month 1 through 12.

(V<sub>U</sub>)<sub>i</sub> = Gallons of coating and/or reducer "i" (minus water) used, as received, during the time period (i.e. one day).

(V<sub>R</sub>)<sub>i</sub> = Gallons of coating and/or reducer "i" (minus water) reclaimed, as received, during the time period (i.e. one day).

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(v<sub>U</sub>)<sub>i</sub> = Gallons of coating and/or reducer "i" (minus water) used, as received, during the time period (i.e. one month).

(v<sub>R</sub>)<sub>i</sub> = Gallons of coating and/or reducer "i" (minus water) reclaimed, as received, during the time period (i.e. one month).

Y<sub>i</sub> = Pounds of VOC per gallon of coating and/or reducer "i" (minus water), as received.

h = Daily hours of operation for EGURSAMINOR

CE = Capture Efficiency
DE = Destruction Efficiency

## **EUSOLV**

1. Calculate the VOCs emission rate in pounds per month and tons per month:

$$bs VOC/month = \sum_{i=1}^{i=n} [(v_{U} \times Y) - (v_{R} \times Y)]_{i}$$

Where:

i = Clean up and purge solvent "i"

v<sub>U</sub> = Gallons of cleanup and purge solvent actually used during the time period (i.e. gallons/month).

VR = Gallons of cleanup and purge solvent recovered for reuse, recycling or disposal during the time period (i.e. gallons/month).

Y = Pounds of VOC per gallon of the solvent.

Tons VOC/month = lbs VOC/month 
$$\times \frac{1 \text{ ton}}{2000 \text{ lbs}}$$

2. Calculate the VOCs emission rate in pounds per hour:

$$lbs VOC/hour = \frac{lbs VOC}{1 month} \times \frac{1 month}{hours of operation}$$

3. Calculate the VOCs emission rate in tons per year:

Tons VOC/year = 
$$\sum_{i=1}^{i=12} (\text{tons VOC/month})_i$$

Where:

i = Month 1 through 12

The annual VOC emission rate will be based on a 12-month rolling time period as determined at the end of each calendar month.

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## Appendix 8. Reporting

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

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

## **B.** Other Reporting

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

#### **Appendix 9. Process/Operation Restrictions**

Proper Operation of Permanent Total Enclosure for EUBCPL

- 1. Access doors and windows in total enclosure must be closed during the routine operation of emission unit.
- 2. The interior of the total enclosure must operate at a lower pressure than its surroundings such that air flows into the enclosure at all natural draft openings at all times. A natural draft opening (NDO) is defined as an opening that is not connected to a duct in which a fan or a blower is installed. Examples of NDOs include entrances and exits to the enclosure that accommodate raw material and product flow.
- 3. Any source of VOC from inside the total enclosure must be at least four equivalent diameters (i.e. four times the opening area divided by the perimeter) from each NDO.
- 4. The total area of all NDOs shall be less than five percent of the surface area of the total enclosure's four walls, floor, and ceiling.
- 5. Installation of a blower in the oven exit vestibule to ensure that air flow from the vestibule into the oven exit NDO at all times during process operation.