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

EFFECTIVE DATE: February 27, 2024

**ISSUED TO** 

Eagle Industries, Inc.

State Registration Number (SRN): N7578

LOCATED AT

30926 Century Drive, Wixom, Oakland County, Michigan 48393

## RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N7578-2024

Expiration Date: February 27, 2029

Administratively Complete ROP Renewal Application Due Between August 27, 2027 and August 27, 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-N7578-2024

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 stateonly enforceable will be noted as such.

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

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

## A. GENERAL CONDITIONS

## **Permit Enforceability**

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

### **General Provisions**

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

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

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

## **Equipment & Design**

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

### **Emission Limits**

- 11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"

  (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 annual compliance certification (pursuant to Rule 213(4)(c)) shall be submitted to the USEPA through the USEPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through CDX (<a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a>), unless it contains confidential business information then use the following address: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- 21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (R 336.1213(3)(c))
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

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

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

#### **Permit Shield**

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

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

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

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

#### Revisions

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

### Reopenings

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

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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))

#### 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:

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).

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

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

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

## C. EMISSION UNIT SPECIAL CONDITIONS

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

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

### **EMISSION UNIT SUMMARY TABLE**

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

Emission Unit ID	Emission Unit Description	Installation	Flexible Group ID
	(Including Process Equipment & Control Device(s))	Date/	
		<b>Modification Date</b>	
EUCELL1	A reaction injection mold processing cell with	03-01-1999 /	FGPOLYFOAM,
	manual spray application of mold release agents	11-08-2010 /	FGNESHAP-
	and automatic spray application of paint coatings.	05-16-2011 /	SUBPARTOOOOO
	Overspray is controlled by dry fabric filters.	10-26-2015	
EUCELL2	A reaction injection mold processing cell with	03-01-1999 /	FGPOLYFOAM,
	manual spray application of mold release agents.	05-16-2011 /	FGNESHAP-
	Overspray is controlled by dry fabric filters.	10-26-2015	SUBPARTO00000
EUCELL3	A reaction injection mold processing cell with	03-01-1999 /	FGPOLYFOAM,
	manual spray application of mold release agents.	05-16-2011 /	FGNESHAP-
	Overspray is controlled by dry fabric filters.	10-26-2015	SUBPARTO00000
EUCELL5	A reaction injection mold processing cell with	12-01-2001 /	FGPOLYFOAM,
	manual and automatic spray application of mold	05-16-2011 /	FGNESHAP-
	release agents. Overspray is controlled by dry	06-17-2014 /	SUBPARTO00000
	fabric filters.	10-26-2015	
EUCELL6	A reaction injection mold processing cell with	03-01-1999 /	FGPOLYFOAM,
	manual and automatic spray application of mold	05-16-2011 /	FGNESHAP-
	release agents. Overspray is controlled by dry	10-26-2015	SUBPARTO00000
FUOFILO	fabric filters.	00.04.0000./	FOROLVEOAM
EUCELL8	A reaction injection mold processing cell with	09-01-2003 / 05-16-2011 /	FGPOLYFOAM, FGNESHAP-
	manual spray application of mold release agents.		_
EUCELL9	Overspray is controlled by dry fabric filters.	10-26-2015	SUBPARTOOOOO
EUCELL9	A reaction injection mold processing cell with automatic spray application of mold release	01-01-2005 / 05-16-2011 /	FGPOLYFOAM, FGNESHAP-
		10-26-2015	SUBPARTOOOOO
	agents. Overspray is controlled by dry fabric filters.	10-20-2015	SUBPARTUUUUUU
EUCELL10	A reaction injection mold processing cell with	10-15-2010 /	FGPOLYFOAM,
	manual spray application of mold release agents	11-8-2010 /	FGNESHAP-
	and automatic spray application of paint coatings.	05-16-2011 /	SUBPARTO00000
	Overspray is controlled by dry fabric filters.	10-26-2015	
EUCELL12	A reaction injection mold processing cell with	06-17-2014 /	FGNESHAP-
	manual spray application of mold release agents.	03-14-2017	SUBPARTO00000
	Overspray is controlled by dry fabric filters.		
EUCELL14	A reaction injection mold processing cell with	12-01-2017 /	FGNESHAP-
	manual spray application of mold release agents	09-08-2023	SUBPARTO00000
	and automatic spray application of paint coatings.		
	Overspray is controlled by dry fabric filters.		

<b>Emission Unit ID</b>	Emission Unit Description	Installation	Flexible Group ID
	(Including Process Equipment & Control Device(s))	Date/	
		<b>Modification Date</b>	
EUCELL15	A reaction injection mold processing cell with	11-01-2020 /	FGNESHAP-
	manual spray application of mold release agents.	09-08-2023	SUBPARTOOOOOO
	Overspray is controlled by dry fabric filters.		
EUGEN1	A natural gas-fired emergency engine. Engine	01-01-2013	FGNSPS-
	power is 20.2 KW (27.1 HP). Engine		SUBPARTJJJJ
	manufactured 07-18-2013.		

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# EUCELL12 EMISSION UNIT CONDITIONS

## **DESCRIPTION**

A reaction injection mold processing cell with manual spray application of mold release agents. Overspray is controlled by dry fabric filters.

Flexible Group ID: FGNESHAP-SUBPARTOOOOO

## **POLLUTION CONTROL EQUIPMENT**

Dry fabric filters

## I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	43.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month		SC VI.3	R 336.1702(a)

## II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Mold Release	6.04 lb VOC/gal (minus water) <sup>a</sup> as applied <sup>2</sup>		EUCELL12	SC V.1	R 336.1702(a)

<sup>&</sup>lt;sup>a</sup> When determining VOC content "minus water," compounds used as organic solvents and which are excluded from the definition of volatile organic compound shall be excluded from the calculation of VOC content.

### 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 336.1224, R 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and / or 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 336.1224, R 336.1702(a))

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUCELL12 unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910)

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2. The permittee shall equip and maintain EUCELL12 with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.<sup>2</sup> (R 336.1702(a))

#### V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any mold release agent, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1225, R 336.1702(a))
- 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 Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702(a))
- 3. The permittee shall keep the following information on a monthly basis for EUCELL12:
  - a. Gallons (with water) of each mold release agent used. (When determining "gallons (with water)" or "VOC content with water," compounds used as organic solvents and which are excluded from the definition of volatile organic compound shall be included in the calculation.)
  - b. VOC content (minus water and with water) of each mold release agent as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

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

4. The permittee shall maintain a log of maintenance or any replacement of the respective exhaust filters for EUCELL12. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910)

#### 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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## 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. SVCELL12MR	<b>24</b> <sup>2</sup>	40 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (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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# EUCELL14 EMISSION UNIT CONDITIONS

## **DESCRIPTION**

A reaction injection mold processing cell with manual spray application of mold release agents and automatic spray application of paint coatings. Overspray is controlled by dry fabric filters.

Flexible Group ID: FGNESHAP-SUBPARTOOOOO

## **POLLUTION CONTROL EQUIPMENT**

Dry fabric filters

## I. EMISSION LIMIT(S)

Р	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. V	/OCs	36.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month		SC VI.3, SC VI.4, SC VI.5	R 336.1702(a)

## II. MATERIAL LIMIT(S)

	Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1.	Mold	6.04 lb VOC/gal (minus	Instantaneous	EUCELL14	SC V.1	R 336.1702(a)
	Release	water) <sup>a</sup> as applied <sup>2</sup>				
2.	Paint	0.46 lb VOC/gal (minus	Instantaneous	EUCELL14	SC V.1	R 336.1702(a)
	Coating	water) <sup>a</sup> as applied <sup>2</sup>				

<sup>&</sup>lt;sup>a</sup> The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound.

### 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 336.1224, R 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370)
- 3. 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 336.1224, R 336.1702(a))

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

1. The permittee shall not operate EUCELL14 unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910)

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2. The permittee shall equip and maintain EUCELL14 with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.<sup>2</sup> (R 336.1702(a))

#### V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any mold release agent, or any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (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, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1225, R 336.1702(a))
- 3. The permittee shall keep the following information on a monthly basis for the mold release application in EUCELL14:
  - a. Gallons (with water) of each mold release agent used.
  - b. VOC content (minus water and with water) of each mold release agent as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative 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 keep the following information on a monthly basis for the paint booth portion of EUCELL14:
  - a. Gallons (with water) of each coating used.
  - b. VOC content (minus water and with water) of each coating as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative 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))

- 5. The permittee shall calculate the VOC emission rate from EUCELL14 monthly, for the preceding 12-month rolling time period, using a method 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(a))
- 6. The permittee shall maintain a log of maintenance or any replacement of the respective exhaust filters for EUCELL14. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1224, R 336.1301, R 336.1910)

## VII. REPORTING

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

#### See Appendix 8

## VIII. STACK/VENT RESTRICTION(S)

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

	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVCELL14MR	<b>24</b> <sup>2</sup>	40 <sup>2</sup>	R 336.1225,
	(Reaction Injection Mold)			40 CFR 52.21(c) & (d)
2.	SVCELL14PB	24 <sup>2</sup>	40 <sup>2</sup>	R 336.1225,
	(Paint Booth)			40 CFR 52.21(c) & (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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# EUCELL15 EMISSION UNIT CONDITIONS

## **DESCRIPTION**

A reaction injection mold processing cell with manual spray application of mold release agents. Overspray is controlled by dry fabric filters.

Flexible Group ID: FGNESHAP-SUBPARTOOOOO

## POLLUTION CONTROL EQUIPMENT

Dry fabric filters

## I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	VOCs	18.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month		SC VI.3	R 336.1702(a)

## II. MATERIAL LIMIT(S)

	Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	Mold release	6.04 lb VOC/gal (minus water) <sup>a</sup> as applied <sup>2</sup>	Instantaneous	EUCELL15	SC V.1, VI.2, VI.3.b	R 336.1702(a)

<sup>&</sup>lt;sup>a</sup> The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound.

## 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 dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1370)
- 3. The permittee shall handle all VOC and/or 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 336.1702(a))

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

1. The permittee shall not operate EUCELL15 unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.<sup>2</sup> (R 336.1301, R 336.1910)

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2. The permittee shall equip and maintain EUCELL15 with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.2 (R 336.1702(a))

#### 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 mold release agent, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ the permittee shall use the Method 24 results to determine compliance.2 (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1225(1), R 336.1702(a))
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material used in EUCELL15, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.2 (R 336.1225(1), R 336.1702(a))
- 3. The permittee shall keep the following information on a monthly basis for EUCELL15:
  - a. Gallons (with water) of each mold release agent used.
  - b. VOC content (minus water and with water) of each mold release agent as applied.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative 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 maintain a log of maintenance or any replacement of the exhaust filters for EUCELL15. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1301, R 336.1910)

### 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)

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
SVCELL15MR (mold release)	242	48 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (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).

## 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
FGPOLYFOAM	A polyurethane foam molding process consisting of eight (8) reaction injection mold processing cells.	EUCELL1, EUCELL2, EUCELL3, EUCELL5, EUCELL6, EUCELL8, EUCELL9, EUCELL10
FGNESHAP- SUBPARTOOOOOO	<b>40 CFR Part 63 Subpart OOOOOO</b> - National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources, including molded flexible polyurethane foam production and flexible polyurethane foam fabrication.	,,
FGNSPS- SUBPARTJJJJ	40 CFR Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE), natural gas-fired lean burn emergency engine(s) greater than 25 HP (19 KW) but less than 100 HP (75 KW). The emergency SI ICE commenced construction after June 12, 2006 and was manufactured on or after January 1, 2009.	EUGEN1

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## **FGPOLYFOAM FLEXIBLE GROUP CONDITIONS**

## **DESCRIPTION**

A polyurethane foam molding process consisting of eight (8) reaction injection mold processing cells.

Emission Units: EUCELL1, EUCELL2, EUCELL3, EUCELL5, EUCELL6, EUCELL8, EUCELL9, EUCELL10

## **POLLUTION CONTROL EQUIPMENT**

Dry fabric filters

## I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating Scenario	 Monitoring/ Testing Method	Underlying Applicable Requirements
1.	VOCs	142.1 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	SC VI.3	R 336.1702(a)
2.	VOCs	36.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	SC VI.3	R 336.1702(a)
3.	VOCs	46.2 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	SC VI.3	R 336.1702(a)
4.	VOCs	56.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	SC VI.3	R 336.1702(a)
5.	Hydrocarbon naphtha (CAS No. 64742-47-8)	53,679 pounds per year <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	SC VI.4	R 336.1225
6.	Naphthalene (CAS No. 91- 20-3)	178.1 pounds per year <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	SC VI.4	R 336.1225

## II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Paint coating	0.50 lb VOC/gal (minus water) <sup>a</sup> as applied <sup>2</sup>	Instantaneous	FGPOLYFOAM	SC V.1	R 336.1702(a)

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	Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
2.	Mold release	6.7 lb VOC/gal (minus water) <sup>a</sup> as applied <sup>2</sup>		FGPOLYFOAM	SC V.1	R 336.1702(a)

<sup>&</sup>lt;sup>a</sup> The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound.

#### 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 336.1224, R 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370)
- 3. 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 336.1224, R 336.1225, R 336.1702(a))

## IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate FGPOLYFOAM unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910)
- 2. The permittee shall equip and maintain each cell within FGPOLYFOAM with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.<sup>2</sup> (R 336.1702(a))

#### V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any paint coating and mold release agent, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

#### VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205, R 336.1224, 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 Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a monthly basis for FGPOLYFOAM:
  - a. Gallons (with water) of each paint coating and mold release agent used.

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- b. VOC content (minus water and with water) of each paint coating and mold release agent as applied.
- c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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 336.1205, R 336.1702)

- 4. The permittee shall keep the following information on a monthly basis for FGPOLYFOAM:
  - Gallons (with water) of each hydrocarbon naphtha (CAS No. 64742-47-8) and naphthalene (CAS No. 91-20-3) containing material used.
  - b. The hydrocarbon naphtha (CAS No. 64742-47-8) and naphthalene (CAS No. 91-20-3) content (with water) in pounds per gallon of each material used.
  - c. Hydrocarbon naphtha (CAS No. 64742-47-8) and naphthalene (CAS No. 91-20-3) mass emission calculations determining the monthly emission rate in pounds per calendar month.
  - d. Hydrocarbon naphtha (CAS No. 64742-47-8) and naphthalene (CAS No. 91-20-3) mass emission calculations determining the annual emission rate in pounds 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 336.1225)

5. The permittee shall maintain a log of maintenance or any replacement of the respective exhaust filters for FGPOLYFOAM. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910)

#### VII. REPORTING

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

#### See Appendix 8

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

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCELL1MR	18 <sup>2</sup>	40 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVCELL1P	30 <sup>2</sup>	402	R 336.1225, 40 CFR 52.21(c) & (d)

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Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
3. SVCELL2MR	242	402	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVCELL3MR	18 <sup>2</sup>	402	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVCELL5MR	242	402	R 336.1225, 40 CFR 52.21(c) & (d)
6. SVCELL6MR	18 <sup>2</sup>	402	R 336.1225, 40 CFR 52.21(c) & (d)
7. SVCELL8MR	242	402	R 336.1225, 40 CFR 52.21(c) & (d)
8. SVCELL9MR	242	402	R 336.1225, 40 CFR 52.21(c) & (d)
9. SVCELL10MR	18 <sup>2</sup>	402	R 336.1225, 40 CFR 52.21(c) & (d)
10. SVCELL10P	15 <sup>2</sup>	402	R 336.1225, 40 CFR 52.21(c) & (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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# FGNESHAP-SUBPARTOOOOO FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

**40 CFR Part 63 Subpart OOOOOO** - National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources, including molded flexible polyurethane foam production and flexible polyurethane foam fabrication.

**Emission Units:** EUCELL1, EUCELL2, EUCELL3, EUCELL5, EUCELL6, EUCELL8, EUCELL9, EUCELL10, EUCELL12, EUCELL14, EUCELL15

## POLLUTION CONTROL EQUIPMENT

Dry fabric filters

## I. EMISSION LIMIT(S)

NA

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee must not use a material containing methylene chloride as an equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process. (40 CFR 63.11416(c)(1))
- 2. The permittee must not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process. (40 CFR 63.11416(c)(2))
- 3. The permittee must not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process. (40 CFR 63.11416(e))

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

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 must have a compliance certification on file by the compliance date. This certification must contain the statements below and must be signed by a responsible official. (40 CFR 63.11417(c)(1))
  - a. "This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR 63.11416(c)(1)."

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b. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 40 CFR 63.11416(c)(2)."

- 2. The permittee may demonstrate compliance with SC III.1, III.2, and III.3 using adhesive usage records, Material Safety Data Sheets, and engineering calculations. (40 CFR 63.11416(f))
- 3. The permittee must maintain records of the information used to demonstrate compliance, as required in SC VI.2. The permittee must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site. (40 CFR 63.11417(d))

### 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)

1. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources specified in 40 CFR Part 63, Subparts A and OOOOOO. (40 CFR Part 63, Subparts A and OOOOOO)

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# FGNSPS-SUBPARTJJJJ FLEXIBLE GROUP CONDITIONS

## **DESCRIPTION**

**40 CFR Part 60, Subpart JJJJ -** Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE), natural gas-fired lean burn emergency engine(s) greater than 25 HP (19 KW) but less than 100 HP (75 KW). The emergency SI ICE commenced construction after June 12, 2006 and was manufactured on or after January 1, 2009.

**Emission Unit: EUGEN1** 

## POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time	Equipment	Monitoring/	Underlying
		Period/Operating		Testing Method	Applicable
		Scenario			Requirements
1. NOx + HC	10 g/HP-hr	Hourly	Each engine in	SC VI.1	40 CFR 60.4233(d),
			FGNSPS-		Table 1 to 40 CFR
			SUBPARTJJJJ		Part 60, Subpart JJJJ
2. CO	387 g/HP-hr	Hourly	Each engine in	SC VI.1	40 CFR 60.4233(d),
			FGNSPS-		Table 1 to 40 CFR
			SUBPARTJJJJ		Part 60, Subpart JJJJ

HC - hydrocarbon

#### II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee may operate each engine in FGNSPS-SUBPARTJJJJ for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the AQD for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. (40 CFR 60.4243(d)(2))
- 2. Each engine in FGNSPS-SUBPARTJJJJ may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as described in SC III.1. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity. (40 CFR 60.4243(d)(3))
- 3. If the permittee purchases an engine certified according to procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year, and operates and maintains the certified stationary SI combustion engine and control device according to the manufacturer's emission related written instructions, the permittee must meet the requirements as specified in 40 CFR Part 1068, Subparts A through D as they apply. If the permittee adjusts

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engine settings according to and consistent with the manufacturer's instructions, the stationary SI internal combustion engine will not be considered out of compliance. (40 CFR 60.4243(a)(1), 40 CFR 60.4243(b)(1))

4. If the permittee purchases an engine certified according to procedures specified in 40 CFR Part 60, Subpart JJJJ. for the same model year, and does not operate and maintain the certified stationary SI combustion engine and control device according to the manufacturer's emission related written instructions, the engine will be considered a non-certified engine. The permittee must keep a maintenance plan and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 60.4243(a)(2)(i), 40 CFR 60.4243(b)(1))

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

1. The permittee must install and maintain a non-resettable hour meter on each engine in FGNSPS-SUBPARTJJJJ. (R 336.1213(3), 40 CFR 60.4237)

## 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. If the permittee purchases an engine certified according to procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year, and operates and maintains the certified stationary SI combustion engine and control device according to the manufacturer's emission related written instructions, the permittee must keep records of conducted maintenance to demonstrate compliance. (40 CFR 60.4243(a)(1), 40 CFR 60.4243(b)(1))
- 2. If the permittee purchases an engine certified according to procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year, and does not operate and maintain the certified stationary SI combustion engine and control device according to the manufacturer's emission related written instructions, the permittee must keep records of conducted maintenance to demonstrate compliance. (40 CFR 60.4243(a)(2)(i), 40 CFR 60.4243(b)(1))
- 3. The permittee must keep records of the following: (40 CFR 60.4245(a))
  - a. All notifications submitted to comply with 40 CFR Part 60, Subpart JJJJ and all documentation supporting any notification. (40 CFR 60.4245(a)(1))
  - b. Maintenance conducted on engine in FGNSPS-SUBPARTJJJJ. (40 CFR 60.4245(a)(2))
  - If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 1048, 1054, and 1060, as applicable. (40 CFR 60.4245(a)(3))
  - d. If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), documentation that the engine meets the emission standards. (40 CFR 60.4245(a)(4))
- 4. The permittee must keep records of the hours of operation for each engine in FGNSPS-SUBPARTJJJJ that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. (40 CFR 60.4243, 40 CFR 60.4245(b))

## VII. REPORTING

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

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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 a notification specifying whether each engine in FGNSPS-SUBPARTJJJJ will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of each engine and within 30 days of switching the manner of operation. (R 336.1213(3), 40 CFR Part 60, Subpart JJJJ)

See Appendix 8

## VIII. STACK/VENT RESTRICTION(S)

NA

## IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all applicable provisions of the federal Standards of Performance for Stationary Spark Ignition Internal Combustion Engines as specified in 40 CFR Part 60, Subparts A and Subpart JJJJ. (40 CFR Part 60, Subparts A and JJJJ)
- 2. The permittee shall comply with all applicable provisions of the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines as specified in 40 CFR Part 63, Subparts A and Subpart ZZZZ. (40 CFR 63.6590(c), 40 CFR Part 63, Subparts A and ZZZZ)

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

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

## **APPENDICES**

**Appendix 1. Acronyms and Abbreviations** 

Appendix 1.	Acronyms and Abbreviations		
400	Common Acronyms		Pollutant / Measurement Abbreviations
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO <sub>2</sub> e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/	Michigan Department of Environment,	gr	Grains
department	Great Lakes, and Energy	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	NOx	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
			microns in diameter
NESHAP	National Emission Standard for Hazardous	pph	Pounds per hour
NSPS	Air Pollutants New Source Performance Standards	ppm	Parts per million Parts per million by volume
NSR	New Source Review	ppmv	Parts per million by weight
PS	Performance Specification	ppmw %	Percent
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure		·
PTI	Permit to Install	psig scf	Pounds per square inch gauge Standard cubic feet
RACT	Reasonable Available Control Technology	sec	Seconds Sulfur Dioxido
ROP	Renewable Operating Permit	SO <sub>2</sub>	Sulfur Dioxide Toxic Air Contaminant
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-N7578-2017. 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-N7578-2017c is being reissued as Source-Wide PTI No. MI-PTI-N7578-2024.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
30-20A*	202300160	Incorporate Permit to Install (PTI) No. 30-20A, which is for use of a new mold release with a higher VOC content material limit in existing reaction injection molding (RIM) processing cells EUCELL14 & EUCELL15, and for increasing the VOC emission limit of EUCELL15.	EUCELL14, EUCELL15
4-06F	201800114 / December 14, 2018	Incorporate PTI No. 4-06F, which is for the installation of RIM processing cell EUCELL14, and also carries over the conditions for existing RIM processing cell EUCELL12 from PTI 4-06E. EUCELL14 has since been permitted under PTI 30-20A.	EUCELL12

## **Appendix 7. Emission Calculations**

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

## Appendix 8. Reporting

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

The permittee shall use 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.