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

EFFECTIVE DATE: February 27, 2024

ISSUED TO

Kawasaki Motors Corp., USA

State Registration Number (SRN): P0677

LOCATED AT

5080 36th Street, Grand Rapids, Kent County, Michigan 49512

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-P0677-2024

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-P0677-2024

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

Julie Brunner, ROP Central Unit Supervisor

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AUTHORITY AND ENFORCEABILITY

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

- 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))
- 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).² (R 336.1370)
- 10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which 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 (https://cdx.epa.gov/), 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.² (**R 336.1912**)

Permit Shield

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

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

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

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control	Installation Date/	Flexible Group ID
	Device(s))	Modification Date	
EU-TEST1	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5A.	06-02-2022	FG-CAM-PCO
EU-TEST2	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5A.	06-02-2022	FG-CAM-PCO
EU-TEST3	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5A.	06-02-2022	FG-CAM-PCO
EU-TEST4	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5A.	06-02-2022	FG-CAM-PCO
EU-TEST5	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5A.	06-02-2022	FG-CAM-PCO
EU-TEST6	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5B.	06-02-2022	FG-CAM-PCO
EU-TEST7	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5B.	06-02-2022	FG-CAM-PCO
EU-TEST8	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5B.	06-02-2022	FG-CAM-PCO
EU-TEST9	Durability/endurance testing of engines up	01-12-2016/	FG-TESTCELLS
	to 50 hp. Exhausted to SV-EF5B.	06-02-2022	FG-CAM-PCO
EU-TEST10	Performance testing of engines up to 50 hp. Exhausted to SV-EF5C.	01-12-2016	FG-TESTCELLS
EU-TEST11	Performance testing of engines up to 50 hp. Exhausted to SV-EF5C.	01-12-2016	FG-TESTCELLS
EU-TEST12	Performance testing of engines up to	01-12-2016	FG-TESTCELLS
EU-TEST13	Performance testing of engines up to 50 hp. Exhausted to SV-EF5C.	01-12-2016	FG-TESTCELLS
EU-TEST14	Performance testing of engines up to 50 hp. Exhausted to SV-EF5C.	01-12-2016	FG-TESTCELLS
EU-TEST15	Rain testing of engines up to 50 hp. Exhausted to SV-EF5D.	01-12-2016	FG-TESTCELLS
EU-TEST16	Climactic testing of engines up to 50 hp. Exhausted to SV-EF5D.	01-12-2016	FG-TESTCELLS
EU-TEST17	Climactic testing of engines up to 50 hp. Exhausted to SV-EF5D.	01-12-2016	FG-TESTCELLS
EU-TEST18	Chassis test cell - testing of engines up to 50 hp. Exhausted to SV-EF5D.	01-12-2016	FG-TESTCELLS

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-TEST19	Chassis test cell - testing of engines up to 50 hp. Exhausted to SV-EF5D.	01-12-2016	FG-TESTCELLS
EU-TEST20	Anechoic chamber test cell - testing of engines up to 50 hp. Exhausted to SV-EF5D.	01-12-2016	FG-TESTCELLS
EU-NATGASHEAT	Natural gas-fired equipment installed along with the original installation of test cells, including air make-up units and a boiler/hot water generator. This emission unit contains no process specific requirements.	01-01-2016	NA
EU-TANKS	One horizontal gasoline storage tank installed along with the original installation of test cells. The tank has a capacity of 2,000 gallons.	01-01-2016	FG- GASDISPENSING
EU-EMERGENCYGEN	One 121 horsepower Caterpillar, diesel- fired emergency generator.	01-01-1981	FG-CIRICEMACT
EU-COLDCLEANER	One cold cleaner.	01-12-2016	FG-COLDCLEANERS

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.

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
FG-TESTCELLS	Twenty (20) test cells, testing gasoline and ethanol- fired engines up to 50 hp.	EU-TEST1, EU-TEST2, EU-TEST3, EU-TEST4, EU-TEST5, EU-TEST6, EU-TEST7, EU-TEST8, EU-TEST9, EU-TEST10, EU-TEST11, EU-TEST12, EU-TEST13, EU-TEST14, EU-TEST15, EU-TEST16, EU-TEST17, EU-TEST18, EU-TEST19, EU-TEST20
FG-CAM-PCO	A pressure-controlled oxidizer (PCO) / catalytic oxidizer used to control emissions from the durability/endurance testing of engines.	EU-TEST1, EU-TEST2, EU-TEST3, EU-TEST4, EU-TEST5, EU-TEST6, EU-TEST7, EU-TEST8, EU-TEST9
FG-GASDISPENSING	This flexible group specifies requirements for a gasoline dispensing facility (GDF) that is subject to 40 CFR Part 63 Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories: Gasoline Dispensing Facilities. This flexible group includes new stationary GDF equipment that was constructed after November 9, 2006, and that have a monthly gasoline throughput less than 10,000 gallons and is located at an area source of hazardous air pollutants. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and includes each storage tank that dispenses gasoline into test engines.	EU-TANKS
FG-CIRICEMACT	Existing emergency diesel fuel fired compression ignition (CI) internal combustion engines with applicability to the Area Source Reciprocating Internal Combustion Engine (RICE) NESHAP 40 CFR Part 63, Subpart ZZZZ. This is applicable to existing stationary CI engines located at an area source of HAPS that commenced construction or reconstruction before June 12, 2006.	EU-EMERGENCYGEN

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.	EU-COLDCLEANER

FG-TESTCELLS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Twenty (20) test cells, testing gasoline and ethanol-fired engines up to 50 hp.

Emission Units: EU-TEST1, EU-TEST2, EU-TEST3, EU-TEST4, EU-TEST5, EU-TEST6, EU-TEST7, EU-TEST8, EU-TEST9, EU-TEST10, EU-TEST11, EU-TEST12, EU-TEST13, EU-TEST14, EU-TEST15, EU-TEST16, EU-TEST17, EU-TEST18, EU-TEST19, EU-TEST20

POLLUTION CONTROL EQUIPMENT

Durability/Endurance cells EU-TEST1 through EU-TEST9 are equipped with a Pressure-Controlled Oxidizer (PCO). The remining eleven (11) test cells are uncontrolled.

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	CO	6.57 lb/gal ^{A,2}	Hourly, uncontrolled	FG-TESTCELLS	SC V.1	40 CFR 52.21(d)
2.	CO	180.7 tpy²	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC V.2, SC VI.3	R 336.1205(1)(a) & (3)
3.	Benzene	291.5 lbs/yr ¹	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC V.2, SC VI.3	R 336.1225
4.	1,3-Butadiene	98.5 lbs/yr ¹	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC V.2, SC VI.3	R 336.1225
5.	Formaldehyde	160.9 lbs/yr ¹	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC V.2, SC VI.3	R 336.1225
6.	Acetaldehyde	1,144.1 lbs/yr ¹	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC V.2, SC VI.3	R 336.1225

^Alb/gal = pound per gallon

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Fuel (any combination of gasoline, ethanol/ gasoline blend, E85)	Total 190,000 gallons, of which no more than 40,000 gallons may be burned uncontrolled ²	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC VI.2	R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(d)

2. The permittee shall only test engines burning gasoline, ethanol, or gasoline/ethanol blends in FG-TESTCELLS.² (R 336.1205, R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

The permittee shall not operate EU-TEST1 through EU-TEST9 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the PCO, has been submitted within 180 days of permit issuance, and is implemented and maintained. The MAP shall include acceptable pressure and temperature ranges of operation based on the previous PCO performance test. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall install and operate devices as necessary to measure the total fuel usage in both controlled and uncontrolled test cells in FG-TESTCELLS.² (R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(d))
- 2. The permittee shall not operate EU-TEST1 through EU-TEST9 unless the associated exhaust is routed to the PCO with a minimum control efficiency of 90% for CO and 95% for VOCs. The permittee shall install, maintain, and operate the PCO in a satisfactory manner acceptable to the AQD District Supervisor and in accordance with the MAP.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910)
- 3. The permittee shall not operate EU-TEST1 through EU-TEST9 unless a minimum operating temperature of 600°F is maintained in the PCO.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910)
- 4. The permittee shall install an interlock to prevent engine operation until the PCO has reached a minimum operating temperature of 600°F.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910)

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 verify the CO emission factor (lb/gal) for FG-TESTCELLS by testing at owner's expense, in accordance with Department requirements within 5 years from the date of the last CO performance test and every 5 years thereafter. The testing shall be performed on one or more test cells, while the engine(s) to be tested are burning gasoline, under conditions which will produce the maximum emission rate. For compliance purposes, the hourly emission rate is the average of the multiple test runs as specified by the testing method. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and B. No

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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. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² (**R 336.1205(1)(a) & (3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(d)**)

2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(d))
- 2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the following for FG-TESTCELLS:
 - a. Total gallons of each fuel burned in EU-TEST1 through EU-TEST9 (controlled).
 - b. Total gallons of each fuel burned in EU-TEST10 through EU-TEST20 (uncontrolled).
 - c. Total gallons of all fuel burned in FG-TESTCELLS.

The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(d))

- 3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period CO, benzene, 1,3butadiene, formaldehyde, and acetaldehyde emission calculation records for FG-TESTCELLS, as required by SC I.2, I.3, I.4, I.5, and I.6, and Appendix 7. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² (R 336.1205(1)(a) & (3), R 336.1225)
- 4. The permittee shall monitor and record the temperature of the PCO on a continuous basis during operation of EU-TEST1 through EU-TEST9. All records shall be kept on file for a period of at least five years and made available to the Department upon request.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910)

See Appendix 7

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD within 60 days after the last date of the test. (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-EF5A	20 ²	48 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-EF5C	20 ²	48 ²	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-EF5D	202	48 ²	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV-EF5E	6 ²	48 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

FG-CAM-PCO FLEXIBLE GROUP CONDITIONS

DESCRIPTION

A pressure-controlled oxidizer (PCO) / catalytic oxidizer used to control emissions from the durability/endurance testing of engines.

Emission Units: EU-TEST1, EU-TEST2, EU-TEST3, EU-TEST4, EU-TEST5, EU-TEST6, EU-TEST7, EU-TEST8, EU-TEST9

POLLUTION CONTROL EQUIPMENT

Pressure-controlled oxidizer (PCO) / catalytic oxidizer

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))

 At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down the engine test cells of FG-CAM-PCO when the temperature of the PCO drops below the minimum temperature requirement. Verification of the interlock system's operational integrity shall be conducted using methods, plans and procedures approved by the AQD prior to testing. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. (R 336.1213(3), 40 CFR 64.6(c)(3), 40 CFR 64.7(c))

VI. MONITORING/RECORDKEEPING

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

- The permittee shall continuously monitor catalyst bed inlet temperature and record every 15 minutes for an hourly average as an indicator of proper operation of the catalytic oxidizer. The indicator range is 600-850°F. (40 CFR 64.6(c)(1)(i) and (ii))
- 2. The permittee shall conduct catalyst cleaning semiannually. (40 CFR 64.6(c)(1)(iii))

- 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 monitor shall continuously monitor catalyst bed inlet temperature. The averaging period is hourly. The monitor shall be calibrated semi-annually. (40 CFR 64.6(c)(1)(iii))
- 5. An excursion is a departure from the temperature indicator range of 600-850°F. (40 CFR 64.6(c)(2))
- 6. An excursion is a departure from the pressure drop indicator range of -5.0 and 0.0" H₂O. (40 CFR 64.6(c)(2))
- 7. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). An interlock system shuts down the engines if the temperature of the PCO drops below 600°F or above 850°F. (40 CFR 64.7(d))
- 8. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during 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))
- 9. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))
- 10. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. (40 CFR 64.9(b)(1))

VII. <u>REPORTING</u>

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

- 4. 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))**
- Each semiannual report of monitoring and deviations shall include a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period. If a QIP has been completed, the report shall include documentation that the plan has been implemented and if it has reduced the likelihood of excursions or exceedances. (40 CFR 64.9(a)(2)(iii))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENTS

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

FG-GASDISPENSING FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group specifies requirements for a gasoline dispensing facility (GDF) that is subject to 40 CFR Part 63, Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories: Gasoline Dispensing Facilities. This flexible group includes new stationary GDF equipment that was constructed after November 9, 2006, and that have a monthly gasoline throughput less than 10,000 gallons and is located at an area source of hazardous air pollutants. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and includes each storage tank that dispenses gasoline into test engines.

Emission Unit: EU-TANKS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee must, at all times, 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. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.11115(a))
- 2. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
 - a. Minimize gasoline spills. (40 CFR 63.11117(a), 40 CFR 63.11116(a)(1))
 - b. Clean up spills as expeditiously as practicable. (40 CFR 63.11117(a), 40 CFR 63.11116(a)(2))
 - c. Cover all pen gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use. (40 CFR 63.11117(a), 40 CFR 63.11116(a)(3))
 - d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. (40 CFR 63.11117(a), 40 CFR 63.11116(a)(4))
- 3. Gasoline storage tanks with capacities of less than 250 gallons are not required to comply with the submerged fill requirements cited in 40 CFR 63.11117(b) but must comply only with all of the requirements in 40 CFR 63.11116. (40 CFR 63.11117(c))
- 4. If the GDF has a monthly throughput of 10,000 gallons of gasoline or more, you must comply with the requirements in 40 CFR 63.11117. (40 CFR 63.11111(c))

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- 5. If the GDF has a monthly throughput of 100,000 gallons of gasoline or more, the permittee must comply with the requirements in 40 CFR 63.11118. (40 CFR 63.11111(d))
- 6. If the GDF's throughput ever exceeds an applicable throughput threshold, the GDF will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold. (40 CFR 63.11111(i))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee must only load gasoline into storage tanks utilizing submerged filling, as defined in 40 CFR 63.11132, and as specified in 40 CFR 63.1117(b)(1), (2), and (3). The applicable distances in 40 CFR 63.11117(b)(1) and (2) shall be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank. (40 CFR 63.11117(b))
 - a. Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank. (40 CFR 63.11117(b)(1))
 - b. Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank. (40 CFR 63.11117(b)(2))
 - c. Submerged fill pipes not meeting the specifications listed on 40 CFR 63.11117(b)(1) and (2) are allowed if the owner or operator can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation for such demonstration must be made available for inspection by the Administrator's delegated representative during the course of a site visit. (40 CFR 63.11117(b)(3))

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, upon request by the USEPA Administrator, demonstrate that its monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable. **(40 CFR 63.11111(e))**
- 2. The permittee must have records of the throughput available within 24 hours of a request by the administrator to document facility's gasoline throughput. (40 CFR 63.11117(d))
- 3. The permittee must keep applicable records as specified in 40 CFR 63.11125(d).
 - a. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.11115(b), 40 CFR 63.11125(d)(1))
 - Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.11115(b), 40 CFR 63.11125(d)(2))

VII. <u>REPORTING</u>

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

- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit an initial notification that you are subject to this subpart by May 9, 2008, or no later than 120 days after the facility becomes subject to 40 CFR Part 63, Subpart CCCCCC or at the time the facility becomes subject to the control requirements in 40 CFR 63.11117, unless the facility meets the requirements in SC VII.6 below. The notification must be submitted to the applicable EPA Regional Office and delegated State authority as specified in 40 CFR 63.13. The initial notification must contain the following information: (40 CFR 63.11117(e), 40 CFR 63.11124(a)(1))
 - a. The name and address of the owner and the operator.
 - b. The address (i.e., physical location) of the GDF.
 - c. A statement that the notification is being submitted in response to this subpart (Gasoline Distribution Area MACT, 40 CFR Part 63, Subpart CCCCCC) and identifying the requirements in paragraphs (a), (b), and (c)(1) or paragraph (c)(2) of 40 CFR 63.11117 that apply to the facility.
- 5. The permittee shall submit a Notification of Compliance Status to the applicable USEPA Regional Office and the delegated state authority, as specified in 40 CFR 63.13, in accordance with the schedule specified in 40 CFR 63.9(h), unless the facility meets the requirements in SC VII.6 below. (40 CFR 63.11124(a)(2))
- If, prior to January 10, 2008, facility was operating in compliance with an enforceable State, local, or tribal rule or permit that requires submerged fill as specified in 40 CFR 63.11117(b), the facility is not required to submit an Initial Notification or a Notification of Compliance Status under SC VII.4 or SC VII.5 listed above. (40 CFR 63.11124(a)(3))
- 7. The permittee must submit reports as specified in 40 CFR 63.11126(b). Each owner or operator of an affected source shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred. (40 CFR 63.11126(b))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. An affected source shall, upon request by the Administrator, demonstrate that their monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable. For new or reconstructed affected sources, as specified in 40 CFR 63.11112(b) and (c), recordkeeping to document monthly throughput must begin upon startup of the affected source. For existing sources, as specified in 40 CFR 63.11112(d), recordkeeping to document monthly throughput must begin on January 10, 2008. For existing sources that are subject to this subpart only because they load gasoline into fuel tanks other than those in motor vehicles, as defined in 40 CFR 63.11132, recordkeeping to document monthly throughput must begin on January 24, 2011. Records required under this paragraph shall be kept for a period of 5 years. (40 CFR Part 63, Subparts A and CCCCCC)
- 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 CCCCCC, for Gasoline Dispensing Facilities. (40 CFR Part 63, Subparts A and CCCCCC)

FG-CIRICEMACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at an area source of HAP emissions, existing emergency, compression ignition (CI) RICE equal to or less than 500 brake hp. A RICE is existing if the date of installation is before June 12, 2006.

Emission Unit: EU-EMERGENCYGEN

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

 The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. (40 CFR 63.6604(b), 40 CFR 1090.305)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee must comply with the requirements in Item 4 of Table 2d of 40 CFR Part 63, Subpart ZZZZ which apply to each engine in FG-CIRICEMACT as specified in the following:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6603(a), 40 CFR Part 63, Subpart ZZZZ, Table 2d.4)**

The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC III.1. (40 CFR 63.6625(i))

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- The permittee shall operate and maintain each engine in FG-CIRICEMACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6605, 40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6.9)
- For each engine in FG-CIRICEMACT, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. (40 CFR 63.6625(h))
- 5. The permittee may operate each engine in FG-CIRICEMACT 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 Department 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 63.6640(f)(2))
- 6. Each engine in FG-CIRICEMACT may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in SC III.5. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 63.6640(f)(4))

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

1. The permittee shall equip and maintain each engine in FG-CIRICEMACT with non-resettable hours meters to track the operating hours. (40 CFR 63.6625(f))

V. <u>TESTING/SAMPLING</u>

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

1. If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (40 CFR 63.6625(i))

VI. MONITORING/RECORDKEEPING

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

- 1. For each engine in FG-CIRICEMACT, the permittee shall keep in a satisfactory manner the following:
 - a. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted,

- b. Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment,
- c. Records of performance tests and performance evaluations,
- d. Records of all required maintenance performed on the air pollution control and monitoring equipment,
- e. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(a), 40 CFR 63.6660)

- For each engine in FG-CIRICEMACT, the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(d), 40 CFR 63.6660, 40 CFR Part 63, Subpart ZZZZ, Table 6.9)
- 3. For each engine in FG-CIRICEMACT, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
- 4. The permittee shall monitor and record, the total hours of operation for each engine in FG-CIRICEMACT on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FG-CIRICEMACT on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall 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. The permittee shall keep all records on file and make them available to the department upon request. (R 336.1213(3) 40 CFR 63.6655(f), 40 CFR 63.6660)
- 5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FG-CIRICEMACT, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. (R 336.1213(3), 40 CFR 1090.305)
- 6. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). (40 CFR 63.6660(a))
- 7. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63.6660(b))

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ for Stationary Reciprocating Internal Combustion Engines. (40 CFR Part 63, Subparts A and ZZZZ)
- 2. The permittee shall implement and maintain an approvable Preventative Maintenance Program. Any revisions or amendments to the Preventative Maintenance Program (PMP) shall by submitted to the AQD District Supervisor within 45 days of the revision for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the PMP or amended PMP shall be considered approved. (**R 336.1213(3)**)

Footnotes:

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

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

FG-COLDCLEANERS 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.

Emission Unit: EU-COLDCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

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

V. TESTING/SAMPLING

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 a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component, used in each cold cleaner. The data may consist of 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. (R 336.1213(3))
- 4. 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))
- As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

VII. <u>REPORTING</u>

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

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See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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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).

APPENDICES

Appendix 1. Acronyms and Abbreviations

	Common Acronyms	_	Pollutant / Measurement Abbreviations
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
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, Great	gr	Grains
department	Lakes, and Energy	НАР	Hazardous Air Pollutant
EĠLE	Michigan Department of Environment, Great	Hg	Mercury
	Lakes, and Energy	hr	Hour
EU	Emission Unit	HP	Horsepower
FG	Flexible Group	H ₂ S	Hvdrogen Sulfide
GACS	Gallons of Applied Coating Solids	kW	Kilowatt
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	m	Meter
	High Volume Low Pressure*	ma	Milligram
	Identification	mm	Millimeter
IKOL	Initial Risk Screening Level		
IISL	Initial Inreshold Screening Level	IVIVV	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
	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 ₂	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	tov	Tons per vear
	State Degistration Number	ιμα	Mierogrom
	State Registration Nulliber	μy	
	I oxicity Equivalence Quotient	μm	
USEPA/EPA	United States Environmental Protection	VUC	volatile Organic Compounds
	Адепсу	yr	Year
VE	Visible Emissions		

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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-P0677-2018. 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-P0677-2018a is being reissued as Source-Wide PTI No. MI-PTI-P0677-2024.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
67-22	202200143	Incorporate PTI No. 67-22 into the ROP, which was to add emission control requirements and restrict fuel burned during uncontrolled testing.	FG-TESTCELLS

Appendix 7. Emission Calculations

Procedures for Calculating Annual Emissions

The permittee shall demonstrate compliance with the CO emission limits (FG-TESTCELLS, SC I.2) by keeping track of fuel usage for FG-TESTCELLS and multiplying that fuel usage by an equipment-specific emission factor. The emission factors are typically expressed as the mass of pollutant per unit of fuel.

CO Emission Calculation:

The permittee shall use 6.57 lb CO/gal fuel to calculate uncontrolled emissions from FG-TESTCELLS, until other emission factors become available from source specific testing (stack testing). If emission factors from other sources are used, the permittee shall obtain the approval of the AQD District Supervisor before using the emission factors to calculate emissions.

The CO control efficiency of 90% shall be used to calculate controlled emissions from FG-TESTCELLS, until a different control efficiency becomes available from a source specific PCO performance test. If control efficiencies from other sources are used, the permittee shall obtain the approval of the AQD District Supervisor before using the emission factors to calculate emissions.

Toxics Emission Calculation:

The permittee shall calculate toxics as a percentage of the total VOCs from FG-TESTCELLS using the percentages in the table below. The permittee shall use 0.16 lb VOC/gal fuel to calculate uncontrolled emissions from FG-TESTCELLS, unless other emission factors become available from source specific testing (stack testing). If emission factors from other sources are used, the permittee shall obtain the approval of the AQD District Supervisor before using the emission factors to calculate emissions.

The VOC control efficiency of 95% shall be used to calculate controlled emissions from FG-TESTCELLS, until a different control efficiency becomes available from a source specific PCO performance test. If control efficiencies from other sources are used, the permittee shall obtain the approval of the AQD District Supervisor before using the emission factors to calculate emissions.

Toxic	% VOC
Benzene	3.84%
1,3-Butadiene	1.30%
Formaldehyde	2.12%
Acetaldehyde	1.18%

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.