

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings)
against **WOODBRIDGE CORPORATION**,)
a corporation organized under the laws of the)
State of Wisconsin and doing business at)
15579 Oakwood Drive, City of Romulus,)
County of Wayne, State of Michigan)
)
 AQD No. 31-2013
 SRN: M4492

STIPULATION FOR ENTRY OF FINAL ORDER
BY CONSENT

This proceeding resulted from allegations by the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) against Woodbridge Corporation (Company), a Wisconsin corporation doing business at 15579 Oakwood Drive, Romulus, Michigan, with State Registration Number (SRN) M4492. The MDEQ alleges that the Company is in violation of Permit to Install (PTI) 126-99A. Specifically, the MDEQ alleges that the Company exceeded the annual permit limit for volatile organic compounds (VOC), exceeded the VOC emission rate for EU00001, and exceeded the material usage limitation of mold release agent, as cited herein and in the Violation Notice dated July 22, 2013. The Company and MDEQ stipulate to the termination of this proceeding by entry of this Stipulation for Entry of a Final Order by Consent (Consent Order).

The Company and MDEQ stipulate as follows:

1. The Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451), MCL 324.101 *et seq.* is an act that controls pollution to protect the environment and natural resources in this State.
2. Article II, Pollution Control, Part 55 of Act 451 (Part 55), MCL 324.5501 *et seq.* provides for air pollution control regulations in this State.
3. The MDEQ was created as a principal department within the Executive Branch of the State of Michigan pursuant to Executive Order 2011-1 and has all statutory authority, powers, duties, functions and responsibilities to administer and enforce all provisions of Part 55.
4. The Director has delegated authority to the Chief of the AQD (AQD Chief) to enter into this Consent Order.

5. The termination of this matter by a Consent Order pursuant to Section 5528 of Part 55 is proper and acceptable.

6. The Company and the MDEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Company that the law has been violated.

7. This Consent Order becomes effective on the date of execution (effective date of this Consent Order) by the AQD Chief.

8. The Company shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in this Consent Order.

COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

9. A. Permit

1. Except as set forth in Paragraph 9.C.1, on and after the effective date of this Consent Order, the Company shall fully comply with the VOC emissions and materials usage limitations set forth in Permit to Install No. 126-99A, and shall be attached to this Consent Order as Exhibit A and made an enforceable part of the Consent Order.

2. On and after the effective date of this Consent Order, the Company shall comply with all other requirements and limitations set forth in Permit to Install No. 126-99A, and any subsequent revision.

9. B. Recordkeeping and Reporting

1. After the effective date of this Consent Order and until termination, the Company shall submit all records which are required to be collected in Exhibit A, to the AQD Detroit District Supervisor for EU00001 and FGFACILITY. These records shall be submitted on a quarterly basis in an acceptable format in accordance with the following schedule: Monthly reports for January, February, and March are due April 30; monthly reports for April, May, and June are due July 31; monthly reports for July, August, and September are due October 31; and monthly reports for October, November, and December are due January 31.

2. Within 30 days after the effective date of this Consent Order, the Company shall submit revised Michigan Air Emission Reporting System (MAERS) data for the calendar years 2011 and 2012.

9. C. Emission Limitations

1. No later than January 1, 2014, the VOC emission rate from FGFACILITY shall not exceed the emission limit specified in Exhibit A.

GENERAL PROVISIONS

10. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state and federal, or local laws or regulations, including without limitation, any amendments to the federal Clean Air Act, 42 USC 7401 *et seq.*, Act 451, Part 55 or their rules and regulations, or to the State Implementation Plan.

11. This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

12. Within thirty (30) days after the effective date of this Consent Order, the Company shall pay to the General Fund of the State of Michigan, in the form of a check made payable to the "State of Michigan" and delivered to the Michigan Department of Environmental Quality, Financial and Business Services Division, Revenue Control, P.O. Box 30657, Lansing, Michigan 48909-8157, a settlement amount of \$31,500.00 which includes AQD costs for investigation and enforcement. This total settlement amount shall be paid within thirty (30) days of the effective date of this Consent Order. To ensure proper credit, all payments made pursuant to this Consent Order shall include the Agreement Identification No. AQD 40037 on the face of the check. This settlement amount is in addition to any fees, taxes, or other fines that may be imposed on the Company by law.

13. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.C.1 of this Consent Order, the Company is subject to a stipulated fine of up to \$10,000.00 per violation. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.A.1, 9.B.1, or 9.B.2 of this Consent Order, the Company is subject to a stipulated fine of up to \$5,000.00 per violation. On and after the effective date of this Consent Order, if

the Company fails to comply with paragraph 9.A.2 or any other provision of this Consent Order, the Company is subject to a stipulated fine of up to \$1,000.00 per violation. The amount of the stipulated fines imposed pursuant to this paragraph shall be within the discretion of the MDEQ. Stipulated fines submitted under this Consent Order shall be by check, payable to the State of Michigan within thirty (30) days of written demand and shall be delivered to the Michigan Department of Environmental Quality, Financial and Business Services Division, Revenue Control, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments shall include the Agreement Identification No. AQD 40037-S on the face of the check. Payment of stipulated fines shall not alter or modify in any way the Company's obligation to comply with the terms and conditions of this Consent Order.

14. The AQD, at its discretion, may seek stipulated fines or statutory fines for any violation of this Consent Order which is also a violation of any provision of applicable federal and state law, rule, regulation, permit, or MDEQ administrative order. However, the AQD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

15. To ensure timely payment of the settlement amount assessed in paragraph 12 and any stipulated fines assessed pursuant to paragraph 13 of this Consent Order, the Company shall pay an interest penalty to the State of Michigan each time it fails to make a complete or timely payment under this Consent Order. The interest penalty shall be determined at a rate of twelve percent (12%) per year compounded annually, using the full increment of amount due as principal, calculated from the due date specified in this Consent Order until the date that delinquent payment is finally paid in full. Payment of an interest penalty by the Company shall be made to the State of Michigan in accordance with paragraph 13 of this Consent Order. Interest payments shall be applied first towards the most overdue amount or outstanding interest penalty owed by the Company before any remaining balance is applied to subsequent payment amount or interest penalty.

16. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 16. The Company also agrees not to contest the legal basis for any stipulated fines assessed pursuant to paragraph 17 of this Consent Order, but reserves the right to dispute in a court of competent jurisdiction the factual basis upon which a demand by MDEQ of stipulated fines is made. In addition, the Company agrees that said fines have not been assessed by the MDEQ pursuant to Section 5529 of Part 55 and therefore are not reviewable under Section 5529 of Part 55.

17. This compliance program is not a variance subject to the 12 month limitation specified in Section 5538 of Part 55.

18. This Consent Order shall remain in full force and effect for a period of at least three (3) years. Thereafter, the Consent Order shall terminate only upon written notice of termination issued by the AQD Chief. Prior to issuance of a written notice of termination, the Company shall submit a request, to the AQD Chief at the Michigan Department of Environmental Quality, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760, consisting of a written certification that the Company has fully complied with all the requirements of this Consent Order and has made all payments including all stipulated fines required by this Consent Order. Specifically, this certification shall include: (i) the date of compliance with each provision of the compliance program and the date any payments or stipulated fines were paid; (ii) a statement that all required information has been reported to the AQD Detroit District Supervisor; (iii) confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facility; and, (iv) such information as may be requested by the AQD Chief.

19. In the event Woodbridge Corporation sells or transfers the facility, with SRN M4492, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within thirty (30) calendar days, the Company shall also notify the AQD Detroit District Office District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. As a condition of the sale, the Woodbridge Corporation must obtain the consent of the purchaser and/or transferee, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the AQD Detroit District Supervisor within thirty (30) days of assuming the obligations of this Consent Order.

20. Prior to the effective date of this Consent Order and pursuant to the requirements of Sections 5511 and 5528(3) of Part 55, the public was notified of a 30-day public comment period and was provided the opportunity for a public hearing.

21. Section 5530 of Part 55 may serve as a source of authority but not a limitation under which the Consent Order may be enforced. Further, Part 17 of Act 451 and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Consent Order.

22. The Company hereby stipulates that entry of this Consent Order is a result of an action by MDEQ to resolve alleged violations of its facility located at 15573 Oakwood Drive, Romulus, Michigan. The Company further stipulates that it will take all lawful actions necessary to fully comply with this Consent Order, even if the Company files for bankruptcy in the future. The Company will not seek discharge of the settlement amount and any stipulated fines imposed hereunder in any future bankruptcy proceedings, and the Company will take necessary steps to ensure that the settlement amount and any future stipulated fines are not discharged. The Company, during and after any future bankruptcy proceedings, will ensure that the settlement amount and any future stipulated fines remain an obligation to be paid in full by the Company to the extent allowed by applicable bankruptcy law.

The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

WOODBRIDGE CORPORATION

Richard Tosak, Vice-President
Print Name and Title
Richard
Signature

Date: *January 8, 2014*

The above signatory subscribed and sworn to before me this *8th* day of *January*, 2014.

Roland Joseph Deschamps
Notary Public

Approved as to Content:

G. Vinson Hellwig
G. Vinson Hellwig, Chief
AIR QUALITY DIVISION
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Dated: *1/23/2014*

Approved as to Form:

Neil Gordon

Neil Gordon, Section Head
ENVIRONMENTAL REGULATION SECTION
ENVIRONMENT, NATURAL RESOURCES,
AND AGRICULTURE DIVISION
DEPARTMENT OF ATTORNEY GENERAL

Dated: *1/21/2014*

FINAL ORDER

The Chief of the Air Quality Division having had opportunity to review the Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Environmental Quality pursuant to the provisions of Part 55 of Act 451 and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that the Consent Order is approved and shall be entered in the record of the MDEQ as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY



G. Vinson Hellwig, Chief
Air Quality Division

Effective Date: 1/23/2014

Exhibit A

Permit to Install 126-99A

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

July 2, 2003

PERMIT TO INSTALL
No. 126-99A

ISSUED TO
Woodbridge Corporation

LOCATED AT
15573 Oakwood Drive
Romulus, Michigan 48174

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
M4492

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: 5/13/2003	
DATE PERMIT TO INSTALL APPROVED: 7/2/2003	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant/Measurement Abbreviations	
AQD	Air Quality Division	Btu	British Thermal Unit
ANSI	American National Standards Institute	°C	Degrees Celsius
BACT	Best Available Control Technology	CO	Carbon Monoxide
CAA	Clean Air Act	dscf	Dry standard cubic foot
CEM	Continuous Emission Monitoring	dsem	Dry standard cubic meter
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NOx	Oxides of Nitrogen
MAP	Malfunction Abatement Plan	PM	Particulate Matter
MDEQ	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns diameter
MIOSHA	Michigan Occupational Safety & Health Administration	pph	Pound per hour
MSDS	Material Safety Data Sheet	ppm	Parts per million
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppmv	Parts per million by volume
NSPS	New Source Performance Standards	ppmw	Parts per million by weight
NSR	New Source Review	psia	Pounds per square inch absolute
PS	Performance Specification	psig	Pounds per square inch gauge
PSD	Prevention of Significant Deterioration	scf	Standard cubic feet
PTE	Permanent Total Enclosure	sec	Seconds
PTI	Permit to Install	SO ₂	Sulfur Dioxide
RACT	Reasonable Available Control Technology	THC	Total Hydrocarbons
SC	Special Condition Number	tpy	Tons per year
SCR	Selective Catalytic Reduction	µg	Microgram
SRN	State Registration Number	VOC	Volatile Organic Compounds
TAC	Toxic Air Contaminant	yr	Year
VE	Visible Emissions		
MRA	Mold Release Agent		
TDI	Toluene Di-isocyanate		

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. [R336.1201(1)]
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. [R336.1201(4)]
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. [R336.1201(6)(b)]
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. [R336.1201(8), Section 5510 of Act 451, PA 1994]
5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R336.1219 and the Department approves the request, this permit 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 R336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. [R336.1219]
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. [R336.1901]
7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department 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 condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). [R336.1912]
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.
11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R336.1303. [R336.1301]
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this permit to install.
12. 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 R336.1370(2). [R336.1370]
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. [R336.2001]

SPECIAL CONDITIONS

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EU00001	Polyurethane foam molding line	S1, S2, S3, S4, S6, S10
EU00002	Foam crushing station	S5
EU00003	TDI storage tanks	S7
EU00004	Polyol storage tanks	NA
EU00005	Mold grinding booth	S9

Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.

Flexible Group Identification

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FGFACILITY	All equipment at the facility including equipment covered by other permits, grand-fathered equipment and exempt equipment.	See above

The following conditions apply to: EU00001

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement
1.1a	VOC	EU00001	33.33	pph	GC 13, SC 1.6	R 336.1901
1.1b	VOC	EU00001 polyurethane foam repair area	No VOC emissions	Continuous	GC 13, SC 1.6	R 336.1702(a)
1.1c	Diethanolamine	EU00001 pour station	0.057	pph	GC 13	R 336.1901
1.1d	Diethanolamine	EU00001 pour station	423	Pounds per year	GC 13	R 336.1901
1.1e	TDI	EU00001 pour station	0.01	pph	GC 13	R 336.1901
The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month.						

Material Usage Limits

	Material	Limit	Testing/ Monitoring Method	Applicable Requirement
1.2a	MRA usage rate in the wax station	Shall not exceed 5 gallons per hour	SC 1.6	R 336.1205(1) R 336.1702(a)
1.2b	MRA usage rate in the wax station	Shall not exceed 31,000 gallons per year	SC 1.6	R 336.1205(1) R 336.1702(a)
1.2c	Paste wax usage rate in the wax station	Shall not exceed 0.18 gallon (1.23 pounds) per hour	SC 1.6	R 336.1205(1) R 336.1702(a)
1.2d	Paste wax usage rate in the wax station	Shall not exceed 1,332 gallons (9,102 pounds) per year	SC 1.6	R 336.1205(1) R 336.1702(a)
1.2e	TDI usage rate in EU00001	Shall not exceed 56.43 gallons per hour	SC 1.6	R 336.1901
1.2f	TDI usage rate in EU00001	Shall not exceed 417,600 gallons per year	SC 1.6	R 336.1901
The annual limits shall be based upon a 12-month rolling time period as determined at the end of each calendar month.				

- 1.3 The VOC content of the paste wax used in EU00001 shall not exceed 4.45 pounds per gallon of paste wax (minus water) as applied. [R 336.1205(1), R 336.1702(a)]

Process/Operational Limits

- 1.4 The permittee shall not operate EU00001 for more than 7,400 hours per 12-month rolling time period as determined at the end of each calendar month. [R 336.1702(a)]

Equipment

- 1.5 The permittee shall equip and maintain all spray booths with HVLP spray guns or equivalent technology with comparable transfer efficiency. [R 336.1702(a)]

Recordkeeping/Reporting/Notification

1.6 The permittee shall keep the following information on a monthly basis for EU00001:

- a) Total usage, in pounds and gallons, of each solvent borne MRA and paste wax.
- b) Total usage, in gallons, of TDI.
- c) VOC content, as a weight percentage, of each solvent borne MRA and paste wax, as applied
- d) VOC mass emission calculations determining the hourly emission rate in pounds per hour and the monthly emission rate in tons per calendar month.
- e) Hours of operation.

The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request.
[R336.1205(1), R336.1702(a), R 336.1901]

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.7a	S1	34	52	R 336.1901
1.7b	S2	26	52	R 336.1901
1.7c	S3	26	52	R 336.1901
1.7d	S4	34	52	R 336.1901
1.7e	S6	26	52	R 336.1901
1.7f	S10	18	52	R 336.1901

The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.

The following conditions apply to: EU00002

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement
2.1a	TDI	EU00002	0.001	pph	GC 13	R 336.1901

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
2.2a	S5	18	52	R 336.1901
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

The following conditions apply to: EU00003

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement
3.1a	TDI	EU00003	0.005	pph	GC 13, SC 3.5	R 336.1901

Material Usage Limits

- 3.2 The TDI storage tank filling rate shall not exceed 50 gallons per minute. [R 336.1901]

Process/Operational Limits

- 3.3 Permittee shall measure and record the weight of the activated carbon adsorption canisters initially upon installation and then on a daily basis. The daily recorded weight shall be compared to the initial weight of the corresponding activated carbon adsorption canister. When the weight of an activated carbon adsorption canister reaches 345 pounds, it shall be replaced within 24 hours and the scales recalibrated to ensure accurate measurement. [R 336.1702(a), R 336.1901, R 336.1910]

Equipment

- 3.4 The permittee shall not operate the TDI storage tanks unless the activated carbon adsorption canisters are installed and operating properly. Proper operation includes, but is not limited to, maintaining a minimum TDI removal efficiency of 95 percent and replacing the activated carbon adsorption canisters in accordance with Special Condition 3.3. [R 336.1702(a), R 336.1901, R 336.1910]

Recordkeeping/Reporting/Notification

- 3.5 A written record of the daily activated carbon adsorption canister weights shall be kept on file for a period of at least five years and made available to the Department upon request. The written record shall identify each activated carbon adsorption canister, the initial weight of each activated carbon adsorption canister, the date and time of weighing, and identify the person making the measurement. [R 336.1702(a), R 336.1901, R 336.1910]

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
3.6a	S7	18	52	R 336.1901
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

The following conditions apply to: EU00005

Equipment

- 4.1 The permittee shall not operate the mold grinding area unless the dust filters are installed and operating properly. [R 336.1910]

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
4.2a	S9	12	52	R 336.1901
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

The following conditions apply to: FGFACILITY

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement
5.1a	VOC	FGFACILITY	96	tons per year	SC 5.3	R 336.1205(1) R 336.1702(a)
5.1b	Individual HAP	FGFACILITY	Less than 9	tons per year	SC 5.3	R 336.1205(1)
5.1c	Aggregate HAPs	FGFACILITY	Less than 25	tons per year	SC 5.3	R 336.1205(1)
Tons per year shall be based upon a 12-month rolling time period as determined at the end of each calendar month.						

Process/Operational Limits

5.2 Any spilled TDI shall be immediately contained and neutralized. Any residual or spilled TDI shall be stored in closed containers, capable of preventing escape of TDI vapors to the ambient air. [R 336.1901]

Recordkeeping / Reporting / Notification

5.3 The permittee shall keep the following information on a monthly basis for EU00001:

- a) 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.
- b) Individual and total HAP mass emission calculations determining the annual emission rates in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1205(1), R336.1702(a)]