

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings)
against **ALMOND PRODUCTS, INC.**, a)
corporation organized under the laws of the)
State of Michigan and doing business at)
17150 148th Avenue in the City of Spring)
Lake, County of Ottawa, State of Michigan)
)

AQD No. 12-2013

SRN: N6578

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 Almond Products, Inc. (Company), a Michigan corporation located at 17150 148th Avenue in the City of Spring Lake, County of Ottawa, State of Michigan, with State Registration Number (SRN) N6578. The MDEQ alleges that the Company has violated Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, Michigan Administrative Code (MAC), 1980 AACRS, R 336.1910 (Rule 910) and various requirements outlined in Permit to Install (PTI) No. 361-06C, PTI 340-08A and PTI 340-08B. Specifically, the MDEQ alleges that the Company did not properly maintain the temperature monitoring devices on the thermal oxidizer, did not utilize current manufacturer data to calculate air emissions, and exceeded the 3.5 pounds/gallon daily volume weighted average coating limit. Furthermore, the MDEQ alleges that the Company failed to timely update the Malfunction Abatement Plan, failed to maintain the proper afterburner temperature on the sand stripper, failed to preheat the sand bed to the required temperature and did not properly determine 12 month rolling average calculations. These violations are detailed in Violation Notices dated September 15, 2008, June 28, 2010, February 7, 2012 and March 11, 2013, all referred to herein as the Violation Notices. 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. Permit
 - A. PTI 340-08C was issued to the Company on August 16, 2013 and it and any subsequent permit revision prior to the termination of this Consent Order shall be attached hereto as Exhibit A and made enforceable as part of this Consent Order.
 - B. PTI 361-06C and any subsequent permit revision prior to the termination of this Consent Order shall be attached hereto as Exhibit B and made enforceable as part of this Consent Order.

GENERAL PROVISIONS

10. On and after the effective date of this Consent Order, except as otherwise provided by the administrative rules of Part 55, the Company shall not install, construct, reconstruct, relocate, alter, or modify any process or process equipment including control equipment pertaining thereto, which may emit an air contaminant, unless a permit to install which authorizes such action is issued by the MDEQ pursuant to Rule 201, the Company is issued a waiver pursuant to Rule 202, or the change is exempt from the requirements of Rule 201.

11. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state, 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.

12. 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.

13. 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 \$15,000.00 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. AQD40018 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.

14. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9 of this Consent Order, the Company is subject to a stipulated fine of up to \$2,000.00 per violation. On and after the effective date of this Consent Order, if the Company fails to comply with any other provision of this Consent Order the Company is subject to a stipulated fine of up to \$500.00 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. AQD40018-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.

15. 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.

16. To ensure timely payment of the settlement amount assessed in paragraph 13 and any stipulated fines assessed pursuant to paragraph 14 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 payment shall be determined at a rate of interest that is equal to one percent (1%) plus the average interest rate paid at auctions of 5-year United States treasury notes during the six months immediately preceding July 1 and January 1, as certified by the state treasurer, compounded annually, and 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 14 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.

17. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 13. The Company also agrees not to contest the legal basis for any stipulated fines assessed pursuant to paragraph 14 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.

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

19. This Consent Order shall remain in full force and effect for a period of at least two (2) 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 Grand Rapids District Supervisor,; (iii) confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facilities; and, (iv) such information as may be requested by the AQD Chief.

20. In the event Almond Products, Inc. sells or transfers any of the facility, with SRN N6578, 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 Grand Rapids 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, Almond Products, Inc. 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 Grand Rapids District Supervisor within thirty (30) days of assuming the obligations of this Consent Order.

21. 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.

22. 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.

23. The Company hereby stipulates that entry of this Consent Order is a result of an action by MDEQ to resolve alleged violations at 17150 148th Avenue in Spring Lake, 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.

ALMOND PRODUCTS, INC.

Joy Ponce, General Manager
Print Name and Title

Joy Ponce Date: 9-19-2013
Signature

The above signatory subscribed and sworn to before me this 20 day of September, 2013.

[Signature]
Notary Public

Approved as to Content:

Approved as to Form:

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

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

Dated: 10/8/13

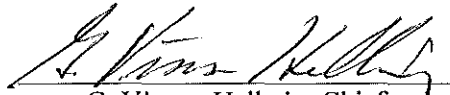
Dated: Oct. 2, 2013

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: 10/8/13

EXHIBIT A

Permit to Install (PTI) 340-08C

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

August 16, 2013

PERMIT TO INSTALL
340-08C

ISSUED TO
Almond Products, Incorporated

LOCATED AT
17150 148th Avenue
Spring Lake, Michigan

IN THE COUNTY OF
Ottawa

STATE REGISTRATION NUMBER
N6578

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:

August 2, 2013

DATE PERMIT TO INSTALL APPROVED:

August 16, 2013

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
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°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
GHGs	Greenhouse Gases	kW	Kilowatt
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	ng	Nanogram
MAP	Malfuction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* 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. **(R 336.1201(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 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(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 R 336.1210, 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. **(R 336.1201(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. **(R 336.1201(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 R 336.1219 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
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. **(R 336.1901)**
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). **(R 336.1912)**
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 R 336.1301, 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 R 336.1303. **(R 336.1301)**
 - 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 R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUSANDSTRIPPER	A Keppel Seghers, Inc. Fluid Clean B-3111/TNV/CEF/LIS fluidized bed sand stripper used to clean accumulated coatings from metal parts, racks, hooks, and/or hangers. The system includes a heated fluidized sand bed; a flame combustion zone maintained at the surface of the sand; a secondary afterburner; and a ceramic element filter particulate control system equipped with upstream exhaust air cooling.	NA
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.		

The following conditions apply to: EUSANDSTRIPPER

DESCRIPTION: A Keppel Seghers, Inc. Fluid Clean B-3111/TNV/CEF/LIS fluidized bed sand stripper used to clean accumulated coatings from metal parts, racks, hooks, and/or hangers. The system includes a heated fluidized sand bed; a flame combustion zone maintained at the surface of the sand; a secondary afterburner; and a ceramic element filter particulate control system equipped with upstream exhaust air cooling.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: A secondary afterburner; a ceramic element filter particulate control system equipped with upstream exhaust air cooling.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.006 lbs per 1000 lbs of exhaust gas ^a	Test Protocol*	EUSANDSTRIPPER	GC 13	R 336.1331(1)(c)
2. PM10	2.2 pph	Test Protocol*	EUSANDSTRIPPER	GC 13	40 CFR 52.21(c) & (d)
3. PM2.5	2.2 pph	Test Protocol*	EUSANDSTRIPPER	GC 13	40 CFR 52.21(c) & (d)
4. Hydrogen chloride (HCl)	9.6 lbs per batch	Test Protocol*	EUSANDSTRIPPER	SC V.1	R 336.1205, R 336.1224, R 336.1225
5. Hydrogen fluoride (HF)	11.5 lbs per batch	Test Protocol*	EUSANDSTRIPPER	SC V.1	R 336.1205, R 336.1224, R 336.1225
^a Calculated on a wet gas basis * Test protocol shall specify averaging time.					

6. Visible emissions from EUSANDSTRIPPER shall not exceed a six-minute average of 5 percent opacity. **(R 336.1301, R 336.1331)**

II. MATERIAL LIMITS

- The permittee shall not process more than 1,095 batches of material in EUSANDSTRIPPER that include coatings containing chromium or chromium compounds per 12-month rolling time period as determined at the end of each calendar month.¹ **(R 336.1224, R 336.1225)**
- The permittee shall not process more than 1,095 batches of material in EUSANDSTRIPPER that include coatings containing manganese or manganese compounds per 12-month rolling time period as determined at the end of each calendar month.¹ **(R 336.1224, R 336.1225)**
- The permittee shall not process more than 1,870 batches of material in EUSANDSTRIPPER that include coatings containing epoxy resins per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205, R 336.1224, R 336.1225)**
- The permittee shall not process more than 1,560 batches of material in EUSANDSTRIPPER that include coatings containing polytetrafluoroethylene (PTFE) resins per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205, R 336.1224, R 336.1225)**

5. The content of any coating removed from parts in EUSANDSTRIPPER shall not exceed 9.05 percent by weight of elemental chromium.¹ **(R 336.1224, R 336.1225)**
6. The content of any coating removed from parts in EUSANDSTRIPPER shall not exceed 5.5 percent by weight of manganese compounds.¹ **(R 336.1224, R 336.1225)**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUSANDSTRIPPER unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 60 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

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. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

2. The permittee not shall process any material in EUSANDSTRIPPER other than cured coatings on metal parts, racks, hooks, and/or hangers. **(R 336.1205, R 336.1224, R 336.1225)**
3. The permittee shall dispose of all collected air contaminants in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1370)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUSANDSTRIPPER unless the secondary afterburner and ceramic element filter particulate control system equipped with upstream exhaust air cooling are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the secondary afterburner includes maintaining a minimum temperature of 1560°F (+/- 50°F) and a minimum retention time of 0.5 seconds. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP as required in SC III.1. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) and (d))**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature for the secondary afterburner for EUSANDSTRIPPER on a continuous basis. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
3. The permittee shall not operate EUSANDSTRIPPER unless the manufacturer's automatic temperature control system for the furnace and secondary afterburner is installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

4. The permittee shall not operate EUSANDSTRIPPER unless an interlock system that shuts down the furnace when the secondary afterburner is not operating properly is installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Within 180 days after permit issuance, the permittee shall verify the HCl and HF emission rates from EUSANDSTRIPPER by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. 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. **(R 336.1205, R 336.1224, R 336.1225, R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required records and calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each cured coating processed in EUSANDSTRIPPER, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. **(R 336.1205, R 336.1224, R 336.1225)**
3. The permittee shall keep, in a satisfactory manner, continuous records of the afterburner temperature at all times when material is processed in EUSANDSTRIPPER. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**
4. The permittee shall conduct all necessary maintenance and make all necessary attempts to keep all components of EUSANDSTRIPPER maintained and operating in a satisfactory manner at all times. The permittee shall keep, in a satisfactory manner, a log of all significant maintenance activities conducted and all significant repairs made to EUSANDSTRIPPER. All records shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911)**
5. The permittee shall keep the following information on a calendar month basis for EUSANDSTRIPPER:
 - a. The number of batches of material that include coatings containing chromium or chromium compounds processed per month and 12-month rolling time period as determined at the end of each calendar month.
 - b. The number of batches of material that include coatings containing manganese or manganese compounds processed per month and 12-month rolling time period as determined at the end of each calendar month.
 - c. The number of batches of material that include coatings containing epoxy resins processed per month and 12-month rolling time period as determined at the end of each calendar month.
 - d. The number of batches of material that include coatings containing PTFE resins processed per month and 12-month rolling time period as determined at the end of each calendar month.
 - e. The content of elemental chromium, in weight percent, of each chromium containing coating removed from parts in EUSANDSTRIPPER.

- f. The content of manganese compounds, in weight percent, of each manganese containing coating removed from parts in EUSANDSTRIPPER.
- g. The permittee shall keep records of any observations of excess ash on processed parts.

The permittee shall keep the records on file, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

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. SVSANDSTRIPPER	18	52	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

EXHIBIT B

Permit to Install (PTI) 361-06C

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

December 15, 2009

**PERMIT TO INSTALL
361-06C**



ISSUED TO
Almond Products, Inc.

LOCATED AT
17150 148th Avenue
Spring Lake, Michigan

IN THE COUNTY OF
Ottawa

**STATE REGISTRATION NUMBER
N6578**

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: December 10, 2009	
DATE PERMIT TO INSTALL APPROVED: December 15, 2009	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
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
EPA	Environmental Protection Agency	gr	Grains
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallon of Applied Coating Solids	H ₂ S	Hydrogen Sulfide
GC	General Condition	hp	Horsepower
HAP	Hazardous Air Pollutant	lb	Pound
HVLP	High Volume Low Pressure *	m	Meter
ID	Identification	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	ng	Nanogram
MDEQ	Michigan Department of Environmental Quality	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	PM less than 10 microns diameter
NSPS	New Source Performance Standards	PM2.5	PM less than 2.5 microns diameter
NSR	New Source Review	pph	Pound per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonably Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SRN	State Registration Number	THC	Total Hydrocarbons
TAC	Toxic Air Contaminant	tpy	Tons per year
TEQ	Toxicity Equivalence Quotient	µg	Microgram
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

* 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. **(R 336.1201(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. **(R 336.1201(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 R 336.1210, 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. **(R 336.1201(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. **(R 336.1201(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 R 336.1219 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
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. **(R 336.1901)**
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). **(R 336.1912)**
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 R 336.1301, 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 R 336.1303. **(R 336.1301)**
 - 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 R 336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUDIPLINE1	Comprised of two alkaline cleaning tanks, five rinse tanks, and a surface pretreatment tank (polymer based solution), followed by a dryer and cool down section, two dip coating tanks, each followed by its own draining station, curing ovens and cool down section.	FGFACILITY
EUDIPLINE2	The paint dip line includes metal surface cleaning/pretreatment operations consisting of a series of tanks containing aqueous cleaning and conditioning solutions followed by two dip coating options including an e-coat tank (waterborne coating) and a traditional paint dip tank (solventbased coating) and cure ovens.	FGFACILITY
EUANOD/ALOD	Surface treatment process line consisting of multiple tanks in which metal parts are either anodized or alodined.	FGFACILITY
EUCOATING	Comprised of four dry filter spray booths and a curing oven.	FGFACILITY
EUBURNOFF	Rack burn-off oven with afterburner used to clean the coating racks.	FGFACILITY

The following conditions apply to: EUDIPLINE1

DESCRIPTION: Comprised of an alkaline cleaning tank followed by two rinse tanks, a complex oxide tank followed by two rinse tanks, a seal tank followed by a dryer and cool down section, two dip coating tanks, each followed by its own draining station, curing ovens and cool down section.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Thermal oxidizer

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	75.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUDIPLINE1	SC VI.4	R 336.1702(a)
2. VOC	410.8 lb/day	Calendar day	EUDIPLINE1	SC VI.4	R 336.1205
3. VOC	6.7 lb/gal (minus water)* as applied prior to control	Instantaneous period	EUDIPLINE1	SC V.1, SC VI.4	R 336.1702(a)
* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))					

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste materials (coatings, reducers, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, reducers, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**

3. The permittee shall not operate EUDIPLINE1 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 30 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
- a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of Oxidizer #1, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits. 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. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUDIPLINE1 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 85 percent (by weight) across the oxidizer, and maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the VOC content, water content, and density of any material (coating, reducer, etc) as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall monitor, in a satisfactory manner, the temperature in the thermal oxidizer on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**

3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (coating, reducer, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
4. The permittee shall keep the following information on a daily basis for the EUDIPLINE1:
- a) Gallons (with water) of each dip coating, diluent solvent, purge solvent or cleanupsolvent used.
 - b) VOC content (minus water and with water) of each dip coating, diluent solvent, purgesolvent or cleanup solvent as applied.
 - c) VOC mass emission calculations determining the daily emission rate in pounds percalendar day.
 - d) VOC mass emission calculations determining the monthly emission rate in tons percalendar month.
 - e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**

5. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

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-OXIDIZER1	41	42	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUDIPLINE2

DESCRIPTION: The paint dip line includes metal surface cleaning/pretreatment operations consisting of a series of tanks containing aqueous cleaning and conditioning solutions followed by two dip coating options including an e-coat tank (waterborne coating) and a traditional paint dip tank (solvent-based coating) and cure ovens.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: An enclosure consisting of a tunnel enclosing the solvent-based coating dip tank and the cure ovens for both solvent-based coating and e-coat; with emissions being routed from the tunnel to a 15,000 cfm thermal oxidizer. E-coat curing oven emissions are only required to be controlled when the solvent-based dip coating line is operating.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
3. VOC	21.8 tpy	12-month rolling time period as determined at the end of each calendar month	EUDIPLINE2	SC VI.6	R 336.1702(a)
2. VOC	161.3 lbs/day	Calendar day	EUDIPLINE2	SC VI.5	R 336.1205

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste materials (coatings, reducers, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, reducers, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1225, R 336.1702(a))**
2. The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
3. The air pressure within the EUDIPLINE2 enclosure shall be maintained lower than the room air pressure so that the air flows into the enclosure at all times. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

4. The permittee shall not operate EUDIPLINE2 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 30 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of Oxidizer #2, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits. 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. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. Whenever the solvent-based coating dip tank is in operation, the permittee shall not operate EUDIPLINE2 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer control system includes a minimum thermal oxidizer VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
2. The permittee shall not operate EUDIPLINE2 unless the enclosure is installed, maintained and operated in a satisfactory manner to eliminate fugitive emissions. Satisfactory operation requires that the enclosure is operating at a pressure lower than all adjacent areas so that air flows into the enclosure through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the VOC content, water content, and density of any material (coating, reducer, etc) as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**
2. Within 180 days after completion of trial operation, verification of satisfactory operation of the enclosure and verification of the destruction efficiency of the thermal oxidizer, by testing at owner's expense, in accordance with Department requirements will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of satisfactory operation of the enclosure and verification of the destruction efficiency of the thermal oxidizer includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall monitor, in a satisfactory manner, the temperature in the thermal oxidizer on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
2. During the initial performance test and semi-annually thereafter, the permittee shall verify that the direction of air flow at each natural draft opening (NDO) of the enclosure for EUDIPLINE2 is into the enclosure. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. 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 complete test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. All test methods, plans, and procedures shall be approved by the AQD prior to testing. After two consecutive tests demonstrate that the direction of air flow at all NDOs is into the enclosure, the permittee may request that the monitoring schedule be revised to a less frequent time period as approved by the District Supervisor. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2001, R 336.2003, R 336.2004)**
3. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**
4. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (coating, reducer, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
5. The permittee shall keep the following information on a daily basis for the EUDIPLINE2:
 - a) Gallons (with water) of each dip coating and diluent solvent used.
 - b) VOC mass emission calculations determining the daily emission rate in pounds percalendar day.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205, R 336.1702(a))**

6. The permittee shall keep the following information on a monthly basis for the EUDIPLINE2:
 - a) VOC content (with water) of each dip coating and diluent solvent.
 - b) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - c) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205, R 336.1702(a))**

7. The permittee shall keep records of all verifications of the direction of air flow at the enclosure natural draft openings. All records shall be kept on file for a period of five years and made available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
8. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer. The permittee shall keep all records on file for a period of at least five years and make them

available to the Department upon request. (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

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-OXIDIZER2	30	55	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUCOATING

DESCRIPTION: Comprised of four dry filter spray booths, and a curing oven.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Fabric Filters

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC and exempt solvents combined	50.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUCOATING	SC VI.3	R 336.1702(a)
2. VOC and exempt solvents combined	1044 lb/day	calendar day	EUCOATING	SC VI.3	R 336.1205
3. Combined Dibasic Esters**	2.37 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUCOATING	SC VI.4	R 336.1225
4. VOC	4.3 lb/gal (minus water)* as applied	Daily volume-weighted average	Clear coats used in EUCOATING	SC VI.3	R 336.1702(d)
5. VOC	3.5 lb/gal (minus water)* as applied	Daily volume-weighted average	Extreme Performance coatings used in EUCOATING	SC VI.3	R 336.1702(d)

* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. **(R 336.1602(4))**

**Dibasic Esters consist of Dimethyl Succinate (CAS No. 106-65-0), Dimethyl Glutarate (CAS No. 119-40-0) and Dimethyl Adipate (CAS No. 627-93-0) combined.

II. MATERIAL LIMITS

1. The VOC content of any other coating type used in EU-COATING shall comply with the limits specified in Rule 336.1621(1)(a) through (g). **(R 336.1702(d))**
2. The permittee shall not use more than 27,000 gallons of tan topcoat F93H107 in EU-COATING per year. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R336.1901, R 336.2802, 40 CFR 52.21, R 336.2803, R336.2804, 40 CRF 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste materials (coatings, reducers, cleanup solvents, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, reducers, cleanup solvents, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EU-COATING unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1331, R 336.1901, R 336.1910)**
2. The permittee shall equip and maintain EU-COATING with high volume low pressure (HVLP) applicators and air-assisted electrostatic spray guns or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the VOC content, water content and density of any materials (coatings, reducers, cleanup solvents, etc.), as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1205, R 336.1225, R 336.1702, R 336.1901)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each materials (coatings, reducers, cleanup solvents, etc.), including the weight percent of each component. The

data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

3. The permittee shall keep the following information on a calendar day basis for EUCOATING:

- a) Gallons (with water) of each coating, catalyst, diluent solvent, additive, purge solvent or cleanup solvent used.
- b) VOC content (minus water and with water) of each coating, catalyst, diluent solvent, additive, purge solvent or cleanup solvent as applied.
- c) VOC emission calculations determining the volume-weighted average VOC content of the clearcoat coatings as applied on a calendar day basis.
- d) VOC emission calculations determining the volume-weighted average VOC content of the extreme performance coatings as applied on a calendar day basis.
- e) VOC and exempt solvents combined mass emission calculations determining the daily emission rate in pounds per calendar day.
- f) VOC and exempt solvents combined mass emission calculations determining the monthly emission rate in tons per calendar month.
- g) VOC and exempt solvents combined 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.
- h) The total amount (in gallons) of tertiary butyl acetate used per calendar month.
- i) The total amount (in gallons) of tertiary butyl acetate used per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1122(f), R 336.1205, R 336.1225, R 336.1702, R 336.1901)**

4. The permittee shall keep the following information on a monthly basis for EUCOATING:¹

- a) Gallons (with water) of each dibasic ester containing material used.
- b) Where applicable, gallons (with water) of each dibasic ester containing material reclaimed.
- c) The dibasic ester content (with water) in pounds per gallon of each material used.
- d) Dibasic ester mass emission calculations determining the monthly emission rate in tons per calendar month.
- e) Dibasic ester mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1225)**

VII. REPORTING

1. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal. **(R 336.1225(4))**

VIII. STACK/VENT RESTRICTIONS

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-BOOTH1	36	58	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-BOOTH2	36	58	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SV-BOOTH3	30	58	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
4. SV-BOOTH4	30	58	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
5. SV-OVEN	24	30	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

The following conditions apply to: EUBURNOFF

DESCRIPTION: Rack burn-off oven with afterburner used to clean the coating racks.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Afterburner

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Permittee shall not operate EU-BURNOFF unless the afterburner is installed, maintained and operated in a satisfactory manner and in accordance with these rules and existing law. **(R 336.1702(a), R 336.1910)**
2. Permittee shall not operate EU-BURNOFF unless a minimum temperature of 1,400°F and a minimum retention time of 0.5 second are maintained in the afterburner. **(R 336.1702(a), R 336.1910)**
3. Permittee shall install, calibrate, maintain and operate the instrumentation used to monitor and record the afterburner temperature in accordance with the manufacturer's specifications. **(R 336.1702(a), R 336.1910)**
4. Permittee shall not load into EU-BURNOFF any material other than cured paint on metal parts.¹ **(R 336.1225, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. Permittee shall equip and maintain EU-BURNOFF with an automatic temperature control system for the primary chamber and the afterburner. **(R 336.1910)**
2. Permittee shall equip and maintain EU-BURNOFF with an interlock system that shuts down the primary chamber burner when the afterburner is not operating properly. **(R 336.1910)**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

The following conditions apply to: EUANOD/ALOD

DESCRIPTION: Surface treatment process line consisting of multiple tanks in which metal parts are either anodized or alodined.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Emissions are controlled by a 25,000 cfm horizontal cross-flow fume scrubber.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.¹ **(R 336.1224, R 336.1225)**

2. The permittee shall handle all HAP containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1901)**

3. The permittee shall not operate EUANOD/ALOD unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 30 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of the fume scrubber, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits. 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. (R 336.1224, R 336.1225, R 336.1901, R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUANOD/ALOD unless the fume scrubber is installed, maintained and operated in a satisfactory manner. (R 336.1224, R 336.1225, R 336.1901, R 336.1910)

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

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
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	EUDIPLINE1, EUDIPLINE2, EUANOD/ALOD, EUCOATING, EUBURNOFF

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT:

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
3. VOCs	Less than 90.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the HAP content of any material (coating, reducer, cleanup solvent, etc.) as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**
2. The permittee shall determine the VOC content, water content, and density of any material (coating, reducer, cleanup solvent, etc.), as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1205(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205(3))**
2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each HAP containing material used.
 - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
 - d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205(3))**

3. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each VOC containing material used.
 - b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
 - d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205(3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA