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

EFFECTIVE DATE: July 28, 2020

ISSUED TO

Howard Miller Company

State Registration Number (SRN): A5937

LOCATED AT

860 Main Street, Zeeland, Ottawa County, Michigan 49464

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-A5937-2020

Expiration Date: July 28, 2025

Administratively Complete ROP Renewal Application Due Between January 28, 2024 and January 28, 2025

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-A5937-2020

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

Michigan Department of Environment, Great Lakes, and Energy

Heidi Hollenbach, Grand Rapids District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R 336.1213(1)(e))

- 6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (**R 336.1213(1)(f)**)
- 7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

Equipment & Design

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

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- 21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (**R 336.1213(3)(c)**)
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

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

Permit Shield

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

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

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

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

DESCRIPTION

All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Each Individual HAP	Less than 9.0 tons per year ²	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, exempt equipment, and any future equipment	SC VI.3	R 336.1205(3)
2.	Aggregate HAPs	Less than 22.5 tons per year ²	0		SC VI.3	R 336.1205(3)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The HAP content of any coating material and/or other material as received, as applied and/or as used, shall be determined using manufacturer's formulation data. Upon request of the AQD District Supervisor, the manufacturer's HAP formulation data shall be verified using USEPA Test Method 311.² (**R 336.1205(3)**)

VI. MONITORING/RECORDKEEPING

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

- 1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.² (**R 336.1201(3)**)
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating and/or other material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. All records shall be kept on file for a period of at least five years and made available to the Department upon request.² (R 336.1205(3))
- 3. The permittee shall keep the following information on a monthly basis for all equipment source-wide.² (R 336.1205(3))
 - a. Identity of each HAP-containing material;
 - b. Gallons or pounds of each HAP-containing material used;
 - c. Where applicable, gallons or pounds of each HAP-containing material reclaimed;
 - d. HAP content, in pounds per gallon or pounds per pound, of each HAP-containing material used;
 - e. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month; and
 - f. 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.
- 4. The records shall be kept in a format acceptable to the AQD District Supervisor.² (R 336.1205(3))

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWOODBOILER1	One 300 hp, 2,910 kw (9,929,332 BTU/hr) Steelcraft Vyncke stoking boiler. The boiler has an automatic under-feed auger that transfers wood-based sawdust into the boiler for fuel. The boiler also has a top- feed conveyor that transfers wood-based solid material into the boiler as an additional fuel source.	08-02-1983 / NA	FGAREASOURCE BOILER
EUSILO	A 21'D x 32'H silo equipped with a system for unloading wood working waste for the wood boiler (EUWOODBOILER1). The building's sawdust collection system is closed loop, thereby reducing particulate emissions significantly. Each collector deposits sawdust through an airlock and disperses it by means of a broadcaster into a 12" main line. The MAC dust collector has a flow rate of approximately 6,000 CFM. The sawdust is transferred from the collectors to either EUSILO for storage, to later be used as fuel, or to a 50-yard dumpster for disposal. The sawdust removal system is designed to control particulate emissions while unloading the dust collectors. PM emissions from this emission unit are subject to 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). The CAM requirements are found in FGPMCAMPLAN.	08-02-1983 / NA	FGPMCAMPLAN

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control	Installation Date/	Flexible Group ID
	Device(s))	Modification Date	
EUWOODEQUIP1	Woodworking equipment controlled by an Alanco baghouse with a flow rate of 85,521 CFM. Externally vented during warm weather and air returned to the plant during cold weather. The PM emissions from this emission unit are subject to 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). The CAM requirements are found in FGPMCAMPLAN.	05-01-1999 / NA	FGWOODEQUIP FGPMCAMPLAN
EUWOODEQUIP2	Woodworking equipment controlled by two Wheelabrators - Frye dustube dust collector, #30, model 126 double K/D type. Each has a cloth area of 10,080 square feet to filter 33,500 CFM of air. Cloth ratio is 3.32 to 1 with standard dust tubes. Externally vented during warm weather and air returned to the plant during cold weather. The PM emissions from this emission unit are subject to 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). The CAM requirements are found in FGPMCAMPLAN.	11-18-1977 / NA	FGWOODEQUIP FGPMCAMPLAN
EUWOODEQUIP3	Woodworking equipment controlled by a reverse air type baghouse dust collector - Dustar 7,045 square feet of filter media. Has attached storage bin to hold 80 cubic yards of material and vibrating bin discharge on dust collector. Flow rate of 75,000 CFM. Removes sawdust from various woodworking equipment. Externally vented during warm weather and air returned to the plant during cold weather. The PM emissions from this emission unit are subject to 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). The CAM requirements are found in FGPMCAMPLAN.	08-18-1987 / NA	FGWOODEQUIP FGPMCAMPLAN
EUSPRAYBOOTH2	Four spray booths and accompanying internally vented ovens used for surface coating of wood clocks and wood accent furniture. The spray booths have mat exhaust filters to capture overspray and are externally vented.	11-18-1977 / NA	NA
EUGLUE	One adhesive spray booth.	1-25-2017	FGRULE287(2)(c)
EURULE290	Any existing or future emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	NA	FGRULE290

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCLDCLNR	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	1983 / NA	FGCOLDCLEANERS

EUWOODBOILER1 EMISSION UNIT CONDITIONS

DESCRIPTION

One 300 hp, 2,910 kw (9,929,332 BTU/hr) Steelcraft Vyncke stoking boiler. The boiler has an automatic underfeed auger that transfers wood-based sawdust into the boiler for fuel. The boiler also has a top-feed conveyor that transfers wood-based solid material into the boiler as an additional fuel source.

Flexible Group ID: FGAREASOURCEBOILER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Particulate Matter	0.50 pound per 1,000 pounds of exhaust gases corrected to 50% excess air ²	Hourly	EUWOOD BOILER1	SC V.1, VI.1 through VI.4	R 336.1331(1)(a) Table 31(A)(6)
2.	Visible Emissions	20%2	6-minute Average	EUWOOD BOILER1	SC VI.1 through VI.3	R 336.1301(1)(c)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall dispose of collected air contaminants in a manner which minimizes the introduction of air contaminants to the outer air.² (R 336.1370)
- 2. The permittee shall maintain and operate EUWOODBOILER1 according to the procedures outlined in an acceptable Preventative Maintenance Plan. Any changes to the Preventative Maintenance Plan shall be submitted to the AQD District Supervisor for review. (**R 336.1213(3**))
- 3. The permittee shall only burn waste material from the wood working operations.² (R 336.1205(a)(ii)(D))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

 Upon request of the AQD District Supervisor, the permittee shall verify Particulate Matter emission rates from EUWOODBOILER1 by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using approved EPA Method listed in 40 CFR Part 60, Appendix A: Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall

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submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

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

- The permittee shall monitor EUWOODBOILER1 to verify it is operating properly by taking visible emission observations for a minimum of once per calendar day. Either a certified or non-certified reader shall take each daily visible emission reading during routine operating conditions. If any visible emissions (other than uncombined water vapor) are observed, the permittee shall immediately conduct certified visual emission readings using 40 CFR Part 60, Appendix A, EPA Method 9. (R 336.1213(3))
- The permittee shall perform visible emission readings at least once each month while EUWOODBOILER1 is operating using Federal Reference Test Method 9 (40 CFR Part 60, Appendix A). A certified reader shall perform each reading. If excessive visible emissions are observed, the permittee shall implement the following procedures: (R 336.1213(3))
 - a. Immediately cease charging EUWOODBOILER1;
 - b. Determine the cause of the excessive visible emissions within four hours of discovery;
 - c. Identify and implement corrective measures to reduce/eliminate the excessive visible emissions within eight hours; or,
 - d. Initiate shut down of the EUWOODBOILER1.
- 3. The permittee shall keep, in a satisfactory manner, records of all visible emission observations and readings for EUWOODBOILER1. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, operational status of the equipment, and status of visible emissions. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1213(3))
- 4. The permittee shall maintain a log of maintenance activities conducted and repairs made to EUWOODBOILER1. Maintenance records for EUWOODBOILER1 shall be consistent with the Preventative Maintenance Program. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1213(3))

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWOODBOILER	25 ²	62.3 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

EUSILO EMISSION UNIT CONDITIONS

DESCRIPTION

A 21'D x 32'H silo equipped with a system for unloading wood working waste for the wood boiler (EUWOODBOILER1). The building's sawdust collection system is closed loop. Each collector deposits sawdust through an airlock and disperses it by means of a broadcaster into a 12" main line. The MAC dust collector has a flow rate of approximately 6,000 CFM. The sawdust is transferred from the collectors to either EUSILO for storage, to later be used as fuel, or to a 50-yard dumpster for disposal. The sawdust removal system is designed to control particulate emissions while unloading the dust collectors. PM emissions from this emission unit are subject to 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). The CAM requirements are found in FGPMCAMPLAN.

Flexible Group ID: FGPMCAMPLAN

POLLUTION CONTROL EQUIPMENT

Baghouse and cyclone

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Particulate Matter	0.1 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis ²	Hourly	EUSILO	SC V.1, VI.1 through VI.3 (FGPMCAM PLAN)	R 336.1331(1)(a), Table 31(J)
2.	Visible Emissions	6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity ²	6-minute Average	EUSILO	SC VI.1 & VI. 2	R 336.1301(1)(c)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The disposal of collected air contaminants shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.² (R 336.1370)
- 2. The permittee shall not operate EUSILO unless the cyclone and fabric filter dust collector are installed and operating properly. Proper operation includes operating the baghouse and cyclone in accordance with the manufacturer's instructions and with the PMP/MAP required in SC III.3. (R 336.1910, R 336.1911)
- 3. The permittee shall not operate EUSILO unless a Preventative Maintenance Plan (PMP) / Malfunction Abatement Plan (MAP) as described in Rule 911(2), for EUSILO and associated control equipment, is implemented and maintained. If at any time the PMP/MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the PMP/MAP within 45 days after such an event occurs. The permittee shall also amend the PMP/MAP within 45 days, if new equipment is

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installed or upon request from the District Supervisor. The permittee shall submit the PMP/MAP and any amendments to the PMP/MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the PMP/MAP or amended PMP/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 336.1910, R 336.1911**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall monitor the baghouse to verify it is operating properly by taking visible emission observations a minimum of once per calendar day. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If any visible emissions (other than uncombined water vapor) are observed, the permittee shall immediately inspect the baghouse and perform any required maintenance. (R 336.1910, R 336.1911)
- 2. The permittee shall keep, in a satisfactory manner, records of all visible emission observations for EUSILO. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, status of visible emissions and operational status of the equipment. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1213(3))
- 3. The permittee shall maintain all records specified in the PMP/MAP, including a log of part replacements, repairs, and maintenance, and all monitoring performed on the baghouse for EUSILO. (R 336.1213(3))

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes: ¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b). ² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUSPRAYBOOTH2 EMISSION UNIT CONDITIONS

DESCRIPTION

Four spray booths and accompanying internally vented ovens used for surface coating of wood clocks and wood accent furniture. The spray booths have mat exhaust filters to capture overspray and are externally vented.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Exhaust filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible Emissions	20%²	6-minute Average	EUSPRAYBOOTH2	SC V.1	R 336.1301(1)(c)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1213(3), R 336.1370)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUSPRAYBOOTH2 unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1213(3), R 336.1301, R 336.1910)

V. TESTING/SAMPLING

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

 Upon request, the permittee shall monitor EUSPRAYBOOTH2 to verify it is operating properly by taking visible emission observations for a minimum of once per calendar day. Either a certified or non-certified reader shall take each daily visible emission observation during routine operating conditions. If any visible emissions (other than uncombined water vapor) are observed, the permittee shall immediately conduct certified visual emission readings using 40 CFR Part 60, Appendix A, EPA Method 9. (R 336.1213(3))

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep, in a satisfactory manner, records of all visible emission observations and readings for EUSPRAYBOOTH2. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, operating status of the equipment, and status of visible emissions. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**

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 The permittee shall maintain a log of maintenance activities conducted and repairs made to EUSPRAYBOOTH2. All records shall be kept on file and made available to the Department upon request. (R 336.1213(3))

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGWOODEQUIP	Wood working equipment controlled by baghouses and cyclones which operate in series. See the Emission Unit Summary Table for details of each baghouse. The PM emissions from EUWOODEQUIP1, EUWOODEQUIP2, and EUWOODEQUIP3 are subject to 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). The CAM requirements are located on FGPMCAMPLAN.	EUWOODEQUIP1 EUWOODEQUIP2 EUWOODEQUIP3
FGPMCAMPLAN	Woodworking operations that produce sawdust (particulate) which is captured and transferred to a baghouse dust collection system. All of these emission units are subject to the requirements of 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). All of the common CAM requirements are in the flexible group.	EUSILO EUWOODEQUIP1 EUWOODEQUIP2 EUWOODEQUIP3
FGRULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation / modification.	EUGLUE
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation / modification.	EURULE290
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCLDCLNR

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGAREASOURCEBOILER	Conditions for any existing large (<10 MMBTU/hour heat input) biomass-fired industrial, commercial or institutional boiler as defined in 40 CFR 63.11237 (excluding seasonal and limited-use boilers and boilers equipped with oxygen trim systems) that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, except as specified in 40 CFR 63.11195.	EUWOODBOILER1

FGWOODEQUIP FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Wood working equipment controlled by baghouses and cyclones which operate in series. See the Emission Unit Summary Table for details of each baghouse. The PM emissions from EUWOODEQUIP1, EUWOODEQUIP2, and EUWOODEQUIP3 are subject to 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). The CAM requirements are located on FGPMCAMPLAN.

Emission Units: EUWOODEQUIP1, EUWOODEQUIP2, EUWOODEQUIP3

POLLUTION CONTROL EQUIPMENT

Baghouses and cyclones

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Particulate Matter	0.01 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis ²	Hourly	EUWOODEQUIP2 EUWOODEQUIP3	SC V.1, VI.1 through VI.3 (FGPMCAM PLAN)	R336.1331(1)(c)
2.	Visible Emissions	20%2	6-minute Average	EUWOODEQUIP2	SC VI.1 & VI.2	R 336.1301(1)(c)
3.	Visible Emissions	6-minute average of 20% opacity, except for one 6- minute average per hour of not more than 27% opacity ²	6-minute Average	EUWOODEQUIP3	SC VI.1 & VI.2	R 336.1301(1)(c)
4.	Particulate Matter	0.01 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis	Hourly	EUWOODEQUIP1	SC V.1, VI.1 through VI.3 (FGPMCAM PLAN)	R336.1301(1)(a)
5.	Visible Emissions	6-minute average of 20% opacity, except for one 6- minute average per hour of not more than 27% opacity	6-minute Average	EUWOODEQUIP1	SC VI.1 & VI.2	R336.1301(1)(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUWOODEQUIP3 unless the dust collection control system (baghouse and cyclone) is installed and operating properly.² (R 336.1910)
- The permittee shall not operate EUWOODEQUIP1 and EUWOODEQUIP2 unless the dust collection control system (baghouses and cyclones) is installed and operating properly. Proper operation includes operating the baghouse and cyclone in accordance with the manufacturer's instructions and with the PMP/MAP required in SC III.3. (R 336.1910, R 336.1911)
- 3. The permittee shall not operate FGWOODEQUIP unless a Preventative Maintenance Plan (PMP) / Malfunction Abatement Plan (MAP) as described in Rule 911(2), for FGWOODEQUIP and associated control equipment, is implemented and maintained. If at any time the PMP/MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the PMP/MAP within 45 days after such an event occurs. The permittee shall also amend the PMP/MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the PMP/MAP and any amendments to the PMP/MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the PMP/MAP or amended PMP/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 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Upon request of the AQD District Supervisor, the permittee shall verify PM emission rates from FGWOODEQUIP by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using approved EPA Method listed in 40 CFR Part 60, Appendix A: Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor the baghouse controlling emissions from FGWOODEQUIP to verify it is operating properly by taking visible emission observations a minimum of once per calendar day. Either a certified or non-certified reader shall take each visible emission observation during routine operating conditions. If any visible emissions (other than uncombined water vapor) are observed, the permittee shall immediately inspect the baghouse and perform any required maintenance. (**R 336.1213(3)**)

- The permittee shall keep, in a satisfactory manner, records of all visible emission observations for the baghouses controlling emissions from FGWOODEQUIP. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, operational status of the equipment, and status of visible emissions. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1213(3))
- 3. The permittee shall maintain all records specified in the PMP/MAP, including a log of part replacements, repairs, and maintenance, and all monitoring performed on the baghouse for FGWOODEQUIP. (R 336.1213(3))

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

FGPMCAMPLAN FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Woodworking operations that produce sawdust (particulate) which is captured and transferred to a baghouse dust collection system. All of these emission units are subject to the requirements of 40 CFR Part 64 for Compliance Assurance Monitoring (CAM). All of the common CAM requirements are in the flexible group.

Emission Units: EUSILO, EUWOODEQUIP1, EUWOODEQUIP2, EUWOODEQUIP3

POLLUTION CONTROL EQUIPMENT

Baghouse and cyclones

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The Building Management System Alarm must be installed and operating properly when any of the following are operational: EUSILO, EUWOODEQUIP1, EUWOODEQUIP2 and EUWOODEQUIP3. (R 336.1213(3)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install and maintain the differential pressure gauge, audible alarm, and associated equipment in proper operating condition. (R 336.1910)

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- The permittee shall continuously measure the pressure drop across each fabric filter collector and record once daily when the woodworking equipment is operational as an indicator of proper operation of each dust collector. The indicator range is 0-inches of water to 10-inches of water. The differential pressure gauge shall be calibrated annually. (40 CFR 64.6(c)(1)(i), (ii) and (iii))
- 2. An excursion is a departure from the indicator range of 0-inches of water to 10-inches of water on the pressure gauge. (40 CFR 64.6(c)(2))

- 3. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). The plan, procedures, and specifications outlined in the CAM Plan shall be initiated if an excursion is detected. The permittee shall also implement the requirements specified in the Preventative Maintenance Plan. (40 CFR 64.7(d))
- 4. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(c)(3), 40 CFR 64.7(c))
- 5. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))
- 6. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. (40 CFR 64.9(a)(2)(i))
- 5. Each semiannual report of monitoring deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all requirements of 40 CFR Part 64. (40 CFR 64.6(c)(3))
- 2. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))
- 3. The permittee may be required to submit a QIP if visible emissions are observed twelve times in a 6-month reporting period, or if pressure drop readings occur outside the range twelve times in a 6-month reporting period. (R 336.1213(3), 40 CFR 64.8(a))

FGRULE287(2)(c) FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: EUGLUE (Installed 1/25/2017) and any future emission units that meet the requirements of this flexible group.

Emission Units installed prior to December 20, 2016: NA

POLLUTION CONTROL EQUIPMENT

EUGLUE is equipped with a mat exhaust filter to capture overspray.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 Gallons/month (minus water as applied)	Calendar month	Each emission unit	R 336.1287(2)(c)(i)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

 Any exhaust system installed <u>on or after</u> December 20, 2016, that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the permittee develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. (R 336.1213(2), R 336.1287(2)(c)(ii), R 336.1910)

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

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 287(2)(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. (R 336.1213(3))
 - a. Volume of coating used, as applied, minus water, in gallons. (R 336.1287(2)(c)(iii))
 - b. Documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. (R 336.1213(3))

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units installed on or after December 20, 2016: EURULE290 and any future emission units that meet the requirements of this flexible group.

Emission Units installed prior to December 20, 2016: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

- Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. (R 336.1290(2)(a)(i))
- 2. Any emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (**R 336.1290(2)(a)(ii)**)
 - a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.

(R 336.1290(2)(a)(ii)(A))

- For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(2)(a)(ii)(B))
- c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (**R 336.1290(2)(a)(ii)(C)**)
- d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed <u>on or after</u> December 20, 2016. (**R 336.1290(2)(a)(ii)(D)**)
- e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed <u>on or after</u> December 20, 2016. (R 336.1290(2)(a)(ii)(E))
- Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: (R 336.1290(2)(a)(iii))

- a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(2)(a)(iii)(A))
- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. (R 336.1290(2)(a)(iii)(B))
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(2)(a)(iii)(C))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)
- 2. The following requirements apply to emission units installed <u>on or after</u> December 20, 2016, utilizing control equipment:
 - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: (R 336.1290(2)(b)(i),

R 336.1910)

- i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
- ii. Wet scrubbers equipped with a liquid flow rate monitor.
- iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
- b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. (R 336.1290(2)(b)(ii), R 336.1910)

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

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. (**R 336.1213(3)**)
 - a. Records identifying each air contaminant that is emitted. (R 336.1213(3))
 - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))

- c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. (R 336.1213(3))
- d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). (R 336.1213(3))
- e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed <u>on or after</u> December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. (R 336.1213(3), R 336.1290(2)(d))
- f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. (R 336.1213(3), R 336.1290(2)(e))
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. (R 336.1213(3))
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(2)(c), R 336.1213(3))
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (**R 336.1213(3)**)
- 3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. (R 336.1213(3))

VII. <u>REPORTING</u>

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUCLDCLNR

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

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

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

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. <u>REPORTING</u>

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

See Appendix 8

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGAREASOURCEBOILER FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Conditions for any existing small (<10 MMBTU/hour heat input) biomass-fired industrial, commercial or institutional boiler as defined in 40 CFR 63.11237 (excluding seasonal and limited-use boilers and boilers equipped with oxygen trim systems) that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, except as specified in 40 CFR 63.11195.

Emission Units: EUWOODBOILER1 and any existing industrial, commercial, and institutional boilers within a subcategory

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

 The boiler shall comply with the definition of the biomass subcategory: the boiler burns any biomass and is not in the coal subcategory. Where biomass means any biomass-based solid fuel that is not a solid waste. (40 CFR 63.11200(b), 40 CFR 63.11237)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 of 40 CFR Part 63, Subpart JJJJJJ that applies to the permittee's boiler. (40 CFR 63.11201(b))
- 2. The permittee must conduct a performance tune-up according to 40 CFR 63.11223(b), stated in SC III.4, and the permittee must submit a signed statement in the Notification of Compliance Status report that indicates that the permittee conducted a tune-up of the boiler. **(40 CFR 63.11214(b))**
- 3. For affected sources subject to the work practice standard or the management practices of a tune-up, the permittee must conduct a performance tune-up according to paragraph (b) of 40 CFR 63.11223, stated in SC III.4, and keep records as required in 40 CFR 63.11225(c), stated in SC VI.1, to demonstrate continuous compliance. The permittee must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. (40 CFR 63.11223(a))
- 4. The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of 40 CFR 63.11223, as listed below. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. **(40 CFR 63.11223(b))**
 - a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.11223(b)(1))**

- b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.11223(b)(2))
- c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. (40 CFR 63.11223(b)(3))
- d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. (40 CFR 63.11223(b)(4))
- e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.11223(b)(5))**
- f. Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of 40 CFR 63.11223, as listed below. **(40 CFR 63.11223(b)(6))**
 - The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. (40 CFR 63.11223(b)(6)(i))
 - ii. A description of any corrective actions taken as a part of the tune-up of the boiler. (40 CFR 63.11223(b)(6)(ii))
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. **(40 CFR 63.11223(b)(6)(iii))**
- g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. (40 CFR 63.11223(b)(7))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The boiler shall have a heat input capacity of less than 10 MMBTU per hour. (40 CFR Part 63, Subpart JJJJJJJ)

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee must maintain the records specified in paragraphs (c)(1) through (7) of 40 CFR 63.11225, as listed below. (40 CFR 63.11225(c))
 - a. As required in 40 CFR 63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted. (40 CFR 63.11225(c)(1))
 - b. The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR 63.11214 and 63.11223 as specified in paragraphs (c)(2)(i) through (vi) of 40 CFR 63.11225, as listed below. **(40 CFR 63.11225(c)(2))**

- i. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. (40 CFR 63.11225(c)(2)(i))
- ii. For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to Section 241.3(b)(1) of this chapter, the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria under Section 241.3(d)(1). If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to Section 241.3(b)(4) of this chapter, the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in Section 241.2 and each of the legitimacy criteria in Section 241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under Section 241.3(c) of this chapter, the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary material as fuel per Section 241.4, the permittee must keep records documenting that the material is a listed non-waste under Section 241.4(a). (40 CFR 63.11225(c)(2)(ii))
- c. Records of the occurrence and duration of each malfunction of the boiler. (40 CFR 63.11225(c)(4))
- d. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), stated in SC IX.4, including corrective actions to restore the malfunctioning boiler to its normal or usual manner of operation. **(40 CFR 63.11225(c)(5))**
- 2. The permittee's records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years. **(40 CFR 63.11225(d))**

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee must submit the notifications specified in paragraphs (a)(1) through (5) of 40 CFR 63.11225, as listed below, to the administrator. (40 CFR 63.11225(a))
 - a. The permittee must submit all of the notifications in 40 CFR 63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to the permittee by the dates specified in those Sections except as specified in paragraphs (a)(2) and (4) of 40 CFR 63.11225. (40 CFR 63.11225(a)(1))
 - b. An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard. (40 CFR 63.11225(a)(2))
 - c. The permittee must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196, stated in SC IX.3. The permittee must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of 40 CFR 63.11225, as listed below. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of 40 CFR 63.11225, as applicable, and signed by a responsible official. (40 CFR 63.11225(a)(4))
 - i. The permittee must submit the information required in 40 CFR 63.9(h)(2), except the information listed in 40 CFR 63.9(h)(2)(i)(B), (D), (E), and (F). (40 CFR 63.11225(a)(4)(i))

- ii. "This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler." (40 CFR 63.11225(a)(4)(ii))
- iii. For units that do not qualify for a statutory exemption as provided in Section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit." (40 CFR 63.11225(a)(4)(v))
- iv. The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (*www.epa.gov/cdx*). However, if the reporting form specific to 40 CFR Part 63, Subpart JJJJJJ is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13. (40 CFR 63.11225(a)(4)(vi))
- 5. The permittee must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of 40 CFR 63.11225. For boilers that are subject only to a requirement to conduct a biennial tune-up according to 40 CFR 63.11223(a) and not subject to emission limits or operating limits, the permittee may prepare only a biennial compliance report as specified in paragraphs (b)(1) and (2) of 40 CFR 63.11225, as listed below. (40 CFR 63.11225(b))
 - a. Company name and address. (40 CFR 63.11225(b)(1))
 - b. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR Part 63, Subpart JJJJJJJ. The permittee's notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official. (40 CFR 63.11225(b)(2))
 - i. "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler." **(40 CFR 63.11225(b)(2)(i))**
 - ii. For units that do not qualify for a statutory exemption as provided in Section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
 (40 CFR 63.11225(b)(2)(ii))
- 6. If the permittee intends to commence or recommence combustion of solid waste, the permittee must provide 30 days prior notice of the date upon which the permittee will commence or recommence combustion of solid waste. The notification must identify: (40 CFR 63.11225(f))
 - a. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice. (40 CFR 63.11225(f)(1))
 - b. The currently applicable subcategory under 40 CFR Part 63, Subpart JJJJJJ. (40 CFR 63.11225(f)(2))
 - c. The date on which the permittee became subject to the currently applicable emission limits. (40 CFR 63.11225(f)(3))
 - d. The date upon which the permittee will commence combusting solid waste. (40 CFR 63.11225(f)(4))
- 7. If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within 40 CFR Part 63, Subpart JJJJJJ, in the boiler becoming subject to 40 CFR Part 63, Subpart JJJJJJ, or in the boiler switching out of 40 CFR Part 63, Subpart JJJJJJJ due to a change to 100 percent natural gas, or the permittee has taken a permit limit that resulted in the permittee being subject to 40 CFR Part 63, Subpart JJJJJJJ, the permittee must provide notice of the date upon which the permittee switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify: (40 CFR 63.11225(g))
 - a. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice. (40 CFR 63.11225(g)(1))
 - b. The date upon which the fuel switch, physical change, or permit limit occurred. (40 CFR 63.11225(g)(2))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. 40 CFR Part 63, Subpart JJJJJJ applies to each existing affected source as defined in paragraph (a)(1) of 40 CFR 63.11194, as listed below. (40 CFR 63.11194(a))
 - a. The affected source of 40 CFR Part 63, Subpart JJJJJJ is the collection of all existing industrial, commercial, and institutional boilers within a subcategory, as listed in 40 CFR 63.11200 and defined in 40 CFR 63.11237, located at an area source. (40 CFR 63.11194(a)(1))
- 2. An affected source is an existing source if the permittee commenced construction or reconstruction of the affected source on or before June 4, 2010. (40 CFR 63.11194(b))
- 3. If the permittee owns or operates an existing affected boiler, the permittee must achieve compliance with the applicable provisions in 40 CFR Part 63, Subpart JJJJJJ as specified in paragraphs (a)(1) of 40 CFR 63.11196, as listed below. **(40 CFR 63.11196(a))**
 - a. If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, the permittee must achieve compliance with the work practice or management practice standard no later than March 21, 2014. (40 CFR 63.11196(a)(1))
- 4. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance records, and inspection of the source. (40 CFR 63.11205(a))
- 5. For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, the permittee must demonstrate initial compliance no later than the compliance date that is specified in 40 CFR 63.11196, stated in SC IX.3, and according to the applicable provisions in 40 CFR 63.7(a)(2), except as provided in paragraph (j) of 40 CFR 63.11210, stated in SC IX.9. **(40 CFR 63.11210(c))**
- 6. If the permittee owns or operates an industrial, commercial, or institutional boiler and would be subject to 40 CFR Part 63, Subpart JJJJJJ except for the exemption in 40 CFR 63.11195(b) for commercial and industrial solid waste incineration units covered by 40 CFR Part 60, Subpart CCCC or Subpart DDDD, and the permittee ceases combusting solid waste, the permittee must be in compliance with 40 CFR Part 63, Subpart JJJJJJ on the effective date of the waste to fuel switch as specified in 40 CFR 60.2145(a)(2) and (3) of Subpart CCCC or 40 CFR 60.2710(a)(2) and (3) of Subpart DDDD. (40 CFR 63.11196(d))
- 7. For affected boilers that ceased burning solid waste consistent with 40 CFR 63.11196(d), stated in SC IX.6, and for which the initial compliance date has passed, the permittee must demonstrate compliance within 60 days of the effective date of the waste-to-fuel switch as specified in 40 CFR 60.2145(a)(2) and (3) of Subpart CCCC or 40 CFR 60.2710(a)(2) and (3) of Subpart DDDD. If the permittee has not conducted their compliance demonstration for 40 CFR Part 63, Subpart JJJJJJ within the previous 12 months, the permittee must complete all compliance demonstrations for 40 CFR 63.11210(g))

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- 8. For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within 40 CFR Part 63, Subpart JJJJJJ or the boiler becoming subject to 40 CFR Part 63, Subpart JJJJJJJ, the permittee must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to 40 CFR 63.11225(g), stated in SC VII.7. (40 CFR 63.11210(h))
- 9. For existing affected boilers that have not operated between the effective date of the rule and the compliance date that is specified for the permittee's source in 40 CFR 63.11196, the permittee must comply with the applicable provisions as specified in paragraph (j)(2) of 40 CFR 63.11210, as listed below. (40 CFR 63.11210(j))
 - a. The permittee must complete the initial performance tune-up, if subject to the tune-up requirements in 40 CFR 63.11223, by following the procedures described in 40 CFR 63.11223(b), stated in SC III.4, no later than 30 days after the re-start of the affected boiler. **(40 CFR 63.11210(j)(2))**
- 10. Table 8 of 40 CFR Part 63, Subpart JJJJJJ shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee. (40 CFR 63.11235)

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

	Acronyms and Abbreviations		Pollutant / Measurement Abbroviations		
Common Acronyms		Pollutant / Measurement Abbreviations acfm Actual cubic feet per minute			
AQD	Air Quality Division		Actual cubic feet per minute		
BACT	Best Available Control Technology	BTU	British Thermal Unit		
CAA	Clean Air Act	°C	Degrees Celsius		
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide		
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent		
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot		
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter		
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit		
Department/	Michigan Department of Environment, Great	gr	Grains		
department	Lakes, and Energy	HAP	Hazardous Air Pollutant		
EGLE	Michigan Department of Environment, Great	Hg	Mercury		
	Lakes, and Energy	hr	Hour		
EU	Emission Unit	HP	Horsepower		
FG	Flexible Group	H₂S	Hydrogen Sulfide		
GACS	Gallons of Applied Coating Solids	kW	Kilowatt		
GC	General Condition	lb	Pound		
GHGs	Greenhouse Gases	m	Meter		
HVLP	High Volume Low Pressure*	mg	Milligram		
ID	Identification	mm	Millimeter		
IRSL	Initial Risk Screening Level	MM	Million		
ITSL	Initial Threshold Screening Level	MW	Megawatts		
LAER	Lowest Achievable Emission Rate	NMOC	Non-methane Organic Compounds		
MACT	Maximum Achievable Control Technology	NOx	Oxides of Nitrogen		
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram		
MAP	Malfunction Abatement Plan	РM	Particulate Matter		
MSDS	Material Safety Data Sheet	PM10	Particulate Matter equal to or less than 10		
NA	Not Applicable		microns in diameter		
NAAQS	National Ambient Air Quality Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter		
NESHAP	National Emission Standard for Hazardous	pph	Pounds per hour		
	Air Pollutants	ppm	Parts per million		
NSPS	New Source Performance Standards	ppmv	Parts per million by volume		
NSR	New Source Review	ppmw	Parts per million by weight		
PS	Performance Specification	%	Percent		
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute		
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge		
PTI	Permit to Install	scf	Standard cubic feet		
RACT	Reasonable Available Control Technology	sec	Seconds		
ROP	Renewable Operating Permit	SO ₂	Sulfur Dioxide		
SC	Special Condition	TAC	Toxic Air Contaminant		
SCR	Selective Catalytic Reduction	Temp	Temperature		
SNCR	Selective Non-Catalytic Reduction	THC	Total Hydrocarbons		
SRN	State Registration Number	tpy	Tons per year		
TEQ	Toxicity Equivalence Quotient	μg	Microgram		
USEPA/EPA	United States Environmental Protection	μm	Micrometer or Micron		
	Agency	voc	Volatile Organic Compounds		
VE	Visible Emissions	yr	Year		
E VISIBLE Emissions Jr Fear					

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-A5937-2015. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-A5937-2015 is being reissued as Source-Wide PTI No. MI-PTI-A5937-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

Appendix 7. Emission Calculations

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

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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