MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

EFFECTIVE DATE: December 21, 2015

REVISION DATE: April 6, 2016

ISSUED TO:

Decorative Panels International and **American Process Incorporated**

State Registration Number (SRN): B1476

LOCATED AT:

416 Ford Avenue, Alpena, Alpena County, Michigan

and

412 Ford Avenue, Alpena, Alpena County, Michigan

RENEWABLE OPERATING PERMIT

MI-ROP-B1476-2015a Permit Number:

Expiration Date: December 21, 2020

Administratively Complete ROP Renewal Application Due Between: June 21, 2019 and June 21, 2020

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 Michigan Air Pollution Control Rule 210(1), 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-B1476-2015a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, 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 Environmental Quality

lañis Ransom, Cadillac 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 Environmental Quality (MDEQ) 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 are 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.

SECTION 1—DECORATIVE PANELS INTERNATIONAL

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.,

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- 6. 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))**
- 7. 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))
- 8. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 9. 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 percent 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 states 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. (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.

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- 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))

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

Revisions

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

Reopenings

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

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(8))

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, MDEQ.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, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R 336.1201(4))

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT 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
EUTRIMMER/PBRUSH-1	Double trimmer and panel brush controlled by Ducon Scrubbers	1956/modified 02/19/1988	NA
EUFIREPUMP	Diesel engine powering emergency fire pump	2000	NA
EUBOILER#1	Boiler fueled by natural gas. Rated at 80,000 pounds of steam per hour.	1956 modified 02/19/1988 09/27/2007 09/27/2015	FGBOILERS1&2
EUBOILER#2	Boiler fueled by natural gas. Rated at 80,000 pounds of steam per hour.	1956 modified 02/19/1988 09/27/2007 09/27/2015	FGBOILERS1&2
EUBOILER#3	Spreader-stoker boiler fueled by natural gas and solid fuels including wood and others identified in this permit. Rated at 60,000 pounds of steam per hour. Controlled by multiclones and an electrostatic precipitator.	1961/modified 02/6/2002 09/27/2007	NA
EUPRESS2S	No. 1 Board press, cooler, and associated equipment controlled by No. 1 Biofilter	1956/modified 12/06/2002	FGPRESSES FGMACTDDDD
EU3PRESS-AREA	No. 3 Board press and cooler controlled by No. 3 Biofilter	1968/modified 08/30/1995	FGPRESSES FGMACTDDDD
EU3 PREDRYER	Board line predryer for Press No. 3, controlled by RCO	1968,modified 03/12/1999	FGPREDRYER- BAKEOVEN, FGMACTDDDD
EU3 BAKEOVEN	Oven for final drying of hard boards, Line 3, controlled by RCO	1968,modified 03/12/99	FGPREDRYER- BAKEOVEN FGMACTDDDD
EUCOLDCLEANER	Any small cold cleaner that is grandfathered out of Rule 201 or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv).	NA	FGCOLDCLEANERS

EUBOILER#3 EMISSION UNIT CONDITIONS

DESCRIPTION

Spreader-stoker boiler fueled by wood chips, natural gas, hardboard dust, waste oil, clarifier oil, and sludge. The boiler is rated at 60,000 pounds of steam per hour.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Multiclones and an electrostatic precipitator

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	HCL	2.2 x 10 ⁻² Ib/MMBtu heat input** ²	At all times except during startup and shutdown Test Protocol*	EUBOILER#3	SC V.5 SC VI.4 Appendix 5-1	40 CFR 63.7500, 40 CFR Part 63, Subpart DDDDD, Table 2.1.a
2.	Mercury	5.7 x 10 ⁻⁶ Ib/MMBtu heat input** ²	At all times except startup and shutdown	EUBOILER#3	SC V.1 SC VI.3 Appendix 5-1	40 CFR 63.7500, 40 CFR Part 63, Subpart DDDDD, Table 2.1.b
3.	Particulate Matter (PM)	3.7 x 10 ⁻² lb/MMBtu heat input** ²	At all times except during startup and shutdown Test Protocol*	EUBOILER#3	SC V.3 SC VI.6	40 CFR 63.7500, 40 CFR Part 63, Subpart DDDDD, Table 2.7.b
4.	Particulate Matter (PM)	0.50 pounds per 1000 pounds of exhaust gasses, corrected to 50% excess air ²	Test Protocol*	EUBOILER#3	SC V.3 SC VI.6	R 336.1205, R 336.1331(1)(c)
5.	Carbon Monoxide	1500 ppmv, dry, at 3% O ₂ , 3 run average** ²	At all times except during startup and shutdown Test Protocol*	EUBOILER#3	SC V.4	40 CFR 63.7500, 40 CFR Part 63, Subpart DDDDD, Table 2.7.a
6.	Visible emissions (opacity)	20 percent ²	Six minute average at all times except for one six- minute average per hour of not more than 27 percent opacity	EUBOILER#3	SC VI.1	R 336.1301
7. *T	emissions (opacity)		Daily block average at all times except during startup and shutdown	EUBOILER#3	SC VI.1	40 CFR Part 63, Subpart DDDDD, Table 4.4
		II determine aver on and after Ja				

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Wastewater Treatment Sludge	2000 pounds per hour ²	based on daily average	EUBOILER#3	SC VI.2	R 336.1205
2.	Clarifier Oil	1000 pounds per hour ²	based on daily average	EUBOILER#3	SC VI.2	R 336.1205
3.	Misc. Waste Oil	55 pounds per hour ²	based on daily average	EUBOILER#3	SC VI.2	R 336.1205
4.	Hardboard Dust	2500 pounds per hour ²	based on daily average	EUBOILER#3	SC VI.2	R 336.1205

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee may burn only the following fuels in EUBOILER#3, up to the design capacity of the boilers or up to the limits set in Section II of this table, for those materials which have such limits.² (R 336.1205)
 - a. Wood chips
 - b. Bark
 - c. Natural gas
 - d. Wastewater treatment sludge generated on site
 - e. Waste oil generated on site
 - f. Clarifier oil generated on site
 - g. Hardboard dust generated on site
- 2. The permittee shall not operate EUBOILER#3 unless the electrostatic precipitator (ESP), multiclone and continuous oxygen trim system are installed, maintained, and operated in a satisfactory manner and the exhaust gasses are directed to stack SVBOIL3-STK58.² (R 336.1911, 40 CFR 63.7525(a))
- 3. The permittee shall only fuel EUBOILER#3 with liquid and solid fuels not considered to be solid waste.² (R 336.1205(3))
- 4. The permittee may burn the exhaust from the wastewater treatment sludge dryer EUSLUDGEDEHYDRTR in EUBOILER#3.¹ (R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETER(S)

 The permittee shall equip boiler stack SVBOIL3-STK58 with a continuous opacity monitoring system (COMS). Each COMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and Performance Specification 1 (PS1) of Appendix B, 40 CFR Part 60. (R 336.2150, R 336.1213(3), 40 CFR 75.25(c))

V. TESTING/SAMPLING

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

- The permittee shall analyze wastewater treatment sludge for arsenic, barium, cadmium, chromium, total lead, mercury, selenium, and silver. Analysis shall be performed on an annual basis using a standard leachate test method as approved by the AQD. The analysis for total mercury shall use an USEPA test method, an American Society of Testing Materials (ASTM) method, or another test method as approved by the AQD. (R 336.1213(3))
- The permittee shall analyze miscellaneous waste oil and clarifier oil for arsenic, cadmium, chromium, lead, flash point, total halogens, PCBs, percent sulfur, and heating value in BTU. Analysis shall be performed on an annual basis using an USEPA test method, an American Society of Testing Materials (ASTM) method, or another test method as approved by the AQD. (R 336.1213(3))

- 3. The permittee shall verify the PM, CO, HCI, and HG emission rates from EUBOILER#3 in accordance with the procedures and schedules required under the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDDD for Major Sources: Industrial Boilers and Process Heaters. (40 CFR 63.7510, 40 CFR 63.7515, 40 CFR 63.7520, Table 5 of 40 CFR 63 Subpart DDDDD)
- 4. The permittee shall verify the PM, CO, HCL, and HG emission rates from EUBOILER#3 on an annual basis except as specified in 40 CFR 63.7515(b) through (e), (g), and (h). **(40 CFR 63.7515(a))**
- The permittee shall perform an annual audit of the COM using the procedures set forth in US EPA Publication 450/4-92-010, "Performance Audits Procedures for Opacity Monitors", or a procedure acceptable to the AQD.² (R 336.1213(3), 40 CFR 63.7575(c))

See Appendix 5-1

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 and continuously record opacity from EUBOILER#3. Six-minute average values shall be based on 24 or more equally spaced instantaneous opacity measurements per six-minute period. The COMS shall be calibrated in accordance with 40 CFR Part 60, Subpart A. This opacity data shall be used for determining compliance with the opacity limit of EUBOILER#3.² (R 336.2150, R 336.1213(3), 40 CFR 63.7575(c))
- On a monthly basis, the permittee shall record the daily usage rate of each fuel fired and total hours each fuel was fired in EUBOILER#3. The permittee shall record this information in a format acceptable to the AQD.² (R 336.1213(3))
- 3. On a monthly basis, the permittee shall calculate and record mercury emissions from EUBOILER#3 in pounds per million BTU heat input, based on mercury concentration in wastewater treatment sludge and amount of sludge burned per hour. The permittee shall perform these calculations and record the results in a manner acceptable to the AQD. (R 336.1213(3), 40 CFR 63.7555(d)(1))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c), 40 CFR 63.7545(d))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**
- 6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. The permittee shall also submit a complete test report to the United States EPA WebFIRE database using CEDRI. (R 336.2001(5), 40 CFR 63.7550(h))

- 7. In accordance with 40 CFR 60.7(c) and (d), a Continuous Opacity Monitor (COM) Excess Emissions Report (EER) and summary report for all COMs shall be submitted in an acceptable format to the AQD within 30 days following the end of each calendar quarter. This EER shall include each excursion, the magnitude of each exceedance of the specified permit limit, the cause of the excess emissions (if known), any periods of monitor downtime, any corrective action taken, and the total operating time of the source(s). If no exceedances or monitoring system downtime occurred during the reporting period, the permittee shall report that fact. (40 CFR 60.7, R 336.1213(c)(1))
- 8. The permittee shall report the results of each annual opacity monitor audit required pursuant to Condition V.5 within 60 days after the completion of the audit.² (R 336.1213(3), 40 CFR 63.7550(h)(2))
- 9. The permittee shall report fuel usage rates for each fuel fired and the total hours each fuel was fired in each boiler. The report shall be in a format acceptable to the AQD and shall be submitted to the AQD within 30 days following the end of the quarter in which the information was collected. (R 336.1213(3)(c))
- 10. If the permittee wishes to revise the test protocol previously approved by the AQD for wastewater treatment sludge, the permittee shall submit the revised test protocol to the AQD not less than 30 days in advance of any applicable required analysis. The permittee shall not use the revised test protocol until it is approved by the AQD. (R 336.1213(3)(a))
- 11. If the permittee wishes to revise the test protocol previously approved by the AQD for miscellaneous waste oil and clarifier oil, the permittee shall submit the revised test protocol to the AQD not less than 30 days in advance of any applicable required analysis. The permittee shall not use the revised test protocol until it is approved by the AQD. (R 336.1213(3)(a))
- 12. The permittee shall report the analytical results for wastewater treatment sludge, clarifier oil, and miscellaneous waste oil. The report shall be in a format acceptable to the AQD and shall be submitted to the AQD within 30 days following the date the analysis was completed. The analytical results shall be reported in milligrams per liter (mg/L) or parts per million (ppm). (R 336.1213(3)(c))

See Appendix 8-1

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOIL123-STK58	86.42	135 ²	R 336.1225 R 336.1331 R 336.2803 R 336.2804 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall implement and maintain a written MAP for EUBOILER#3. This plan shall include information on startup and shutdown of EUBOILER#3 and device operating variables. The plan must be approved by the AQD. Changes to the plan may be made upon written approval of the AQD. (R 336.1911)
- If the MAP for EUBOILER#3 does not adequately prevent, detect, and correct malfunctions or equipment failures that result in emissions exceeding any applicable emission limit, the permittee shall prepare a revised MAP which addresses these deficiencies and shall submit the revised MAP to the AQD for approval. (R 336.1911)

- 3. The test results for concentration of arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver in the wastewater treatment sludge must be below the levels found in Appendix 5-1A. (R 336.1224, R 336.1225)
- 4. The test results for concentration of arsenic, cadmium, chromium, lead, flash point, total halogens, PCBs and sulfur in the miscellaneous waste oil and clarifier oil must be below the levels found in Appendix 5-1B. (R 336.1224, R 336.1225)
- 5. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDDD for Major Sources: Industrial Boiler and Process Heaters. **(40 CFR Part 63, Subpart A, 40 CFR Part 63, Subpart DDDDD, 40 CFR 63.7490)**

Footnotes:

¹This 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).

EUTRIMMER/PBRUSH EMISSION UNIT CONDITIONS

DESCRIPTION

Double trimmer and panel brush

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Ducon Dual Scrubbers

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Particulate matter	0.10 pounds per 1000 pounds exhaust gasses, dry basis ²	Test Protocol*	EUTRIMMER/PBRUSH	SC V.1 SC VI.3	R 336.1331(1)(c)

*Test protocol shall determine averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUTRIMMER/PBRUSH unless the Ducon scrubbers are installed, maintained, and operated in a satisfactory manner.² (R 336.1911)
- 2. The permittee shall not operate EUTRIMMER/PBRUSH unless the pressure drop across the Ducon scrubbers is within the acceptable range proven adequate by a stack test and indicated in a MAP approved by the AQD for the Ducon scrubbers. (R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall equip the Ducon scrubbers with a flow rate monitor and an alarm to ensure that water is flowing to the scrubbers. (R 336.1331(1)(c))
- 2. The permittee shall equip the Ducon scrubbers with a working pressure drop instrument. (R 336.1331(1)(c))

V. TESTING/SAMPLING

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

 The permittee shall verify the PM emission rate from EUTRIMMER/PBRUSH by conducting a stack test once every five years. All testing, sampling, analytical and calibration procedures performed under this condition shall be performed in accordance with applicable Federal Reference Methods, 40 CFR Part 60, Appendix A. (R 336.1213(3), R 336.2001)

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 continuously monitor water flow rate to the Ducon scrubbers. An alarm shall indicate when the water flow rate to the Ducon scrubbers falls below the minimum flow level as specified in the MAP for EUTRIMMER/PBRUSH. (R 336.1910, R 336.1213(3))
- 2. If an alarm sounds, the permittee shall perform those actions specified in the MAP and shall document the actions taken in response to the alarm. (R 336.1213(3))
- 3. The permittee shall monitor and record, once per calendar day of operation and in a manner and with instrumentation acceptable to AQD, the pressure drop across the Ducon scrubbers. If the pressure drop is outside the acceptable range indicated in the MAP, the permittee shall perform those actions specified in the MAP and shall document the actions taken. (R 336.1910, 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 two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (**R 336.2001(4**))
- The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

See Appendix 8-1

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVDUCONSCRB-STK87	60 ²	49.5 ²	R 336.1331(1)(c)
2.	SVDUCONSCRB-STK88	40 ²	51 ²	R 336.1331(1)(c)

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall implement and maintain a written MAP for the Ducon scrubbers. The plan shall include the minimum water flow to and the acceptable range for pressure drop across the scrubbers. The plan must be approved by the AQD. Changes to the plan may be made upon written approval by the AQD. (R 336.1911)
- 2. If the MAP for the Ducon scrubbers does not adequately prevent, detect, and correct malfunctions or equipment failures that result in emissions exceeding any applicable emission limitation, the permittee shall prepare a revised MAP which addresses these deficiencies and shall submit the revised MAP to the AQD for approval. (R 336.1911)

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).

EUFIREPUMP EMISSION UNIT CONDITIONS

DESCRIPTION

Diesel-fired (compression ignition) reciprocating internal combustion engine rated at less than 500 horsepower, powering a fire pump which is for emergency use only

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Ро	llutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
	NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee may operate EUFIREPUMP as necessary during emergencies with no time limit. (40 CFR 63.6640(f)(1))
- 2. The permittee may operate EUFIREPUMP for the following purpose for a maximum of 100 hours per calendar year. (40 CFR 63.6640(f)(2))
 - a. Maintenance checks and readiness testing provided that the tests are recommended by Federal, State, or local government, the engine manufacturer or vendor, or the insurance company associated with EUFIREPUMP. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require main tenance and testing of EUFIREPUMP beyond 100 hours per calendar year.
- 3. The permittee may operate EUFIREPUMP for up to 50 hours per engine per year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours of operation allowed under SC III.2. (40 CFR 63.6640(f)(3))
- 4. The permittee shall operate and maintain EUFIREPUMP according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air-pollution control practice for minimizing emissions. (40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6)

Section 1 – Decorative Panels International

- 5. The permittee shall comply with the following operational requirements:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.6.
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If EUFIREPUMP is being operated during an emergency and it is not possible to shut down EUFIREPUMP to perform the work practice standards on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice standard can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1)**

- 6. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.5. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows:
 - a. Total Base Number is less than 30 percent of the Total Base Number of the oil when new;
 - b. Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
 - c. Percent water content (by volume) is greater than 0.5.

If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The analysis program must be part of the maintenance plan for EUFIREPUMP. (40 CFR 63.6625(i))

- 7. The permittee shall minimize EUFIREPUMP's time spent at idle during startup and minimize the EUFIREPUMP's startup time to a period needed for appropriate and safe loading of EUFIREPUMP, not to exceed 30 minutes. (40 CFR 63.6625(h))
- 8. The permittee must be in compliance with the emission limitations and operating limitations in this subpart that apply to EUFIREPUMP at all times. (40 CFR 63.6605(a))
- 9. The permittee shall operate and maintain EUFIREPUMP in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you 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 which may include, but is not limited to, monitoring results, review of operation and maintenance records, and inspection of the source. (40 CFR 63.6605(b))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUFIREPUMP with a non-resettable hour meter. (40 CFR 63.6625(f))

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

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

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 keep the following records: (40 CFR 63.6655)
 - a. A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance status, according to the requirements of 40 CFR 63.10(b)(2)(xiv)
 - b. Records of the occurrence and duration of each malfunction of EUFIREPUMP.
 - Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning equipment to its normal or usual manner of operation.
 - d. Records to demonstrate continuous compliance with operating limitations in SC III.4.
 - e. Records of the maintenance conducted on EUFIREPUMP in order to demonstrate that EUFIREPUMP is operated and maintained according to the maintenance plan.
 - f. Records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation; including what classified the operation as emergency and how many hours were spent during non-emergency operation.
- 2. The permittee must keep records of the parameters that are analyzed as part of the oil analysis program in SC III.6, the results of the analysis, and the oil changes for EUFIREPUMP. (40 CFR 63.6625(i))

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))

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

 The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ. (40 CFR Part 63, Subparts A and ZZZZ)

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 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
FGMACTDDDD	All equipment subject to 40 CFR Part 63, Subpart DDDD: National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products	EUPRESS2S EU3PRESS-AREA EU3 PREDRYER EU3 BAKEOVEN
FGBOILERS1&2	Boilers 1 and 2, fueled by natural gas.	EUBOILER#1 EUBOILER#2
FGPRESSES	No. 1 and No. 3 presses, coolers, and associated equipment. Controlled by two Biofilters.	EUPRESS2S EU#3PRESS-AREA
FGPREDRYER- BAKEOVEN	Predryer and bake oven for the No. 3 press line. Controlled by regenerative thermal oxidizer.	EU#3PREDRYER EU#3BAKEOVEN
FGCOLDCLEANERS	Any small cold cleaners that are grandfathered out of Rule 201 or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv).	EUCOLDCLEANER

FGMACTDDDD FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All equipment on site subject to National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD

Emission Units: EUPRESS2S, EU3PRESS-AREA, EU3PREDRYER, EU3BAKEOVEN

POLLUTION CONTROL EQUIPMENT

Two Biofilters, RCO (on some of the emission units, others uncontrolled)

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Total HAP as	Only ONE of	Test Protocol*	EUPRESS2S	SC V.1	40 CFR
	defined in	the following		EU3PRESS-AREA	SC V.3	63.2240(b)
	40 CFR	for each		EU3BAKEOVEN	SC VI.1	
	63.2292	emission unit:			SC VI.2	
		90% reduction,				
		measured as				
		total				
		hydrocarbons				
		20 ppmvd,				
		measured as				
		THC				
		90% reduction				
		in methanol				
		emissions				
		90% reduction				
		in formaldehyde				
		emissions				
		Methanol				
		1 ppmvd (if				
		methanol				
		entering control				
		device is				
		greater than 10				
		ppmvd)				
		Formaldehyde				
		1 ppmvd (if				
		formaldehyde				
1		entering control				
1		device is				
		greater than 10				
		ppmvd)				

*Test protocol shall determine averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. At any time a process controlled by the catalytic oxidizer is operating, the permittee shall maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test according to 40 CFR 63.2262(e). (40 CFR 63.2270, 40 CFR 63.2240)
- 2. At any time a process controlled by either Biofilter is operating, the permittee shall maintain the 24-hour block Biofilter bed temperature within the range established during the performance test according to 40 CFR 63.2262(m). (40 CFR 63.2270, 40 CFR 63.2240)
- 3. The permittee may request a routine control device maintenance exemption for routine maintenance events. Such a request must justify the need for the routine maintenance on the control device and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe how the permittee will make reasonable efforts to minimize emissions during the maintenance, and provide any other documentation required by the AQD. Routine control device maintenance exemptions must not exceed 0.5 percent of annual operating uptime for each process unit controlled. **(40 CFR 63.2251)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. For EUPRESS2S and EU3PRESS-AREA, the permittee shall use a wood products enclosure as defined in 40 CFR 63.2292. The wood products enclosure for EUPRESS2S and EU3PRESS-AREA shall comply with the following standards: (40 CFR 63.2267, 40 CFR 63.2292)
 - a. Any natural draft opening shall be at least four equivalent opening diameters from each HAP-emitting point, except for where board enters and exits the enclosure, unless otherwise specified by the AQD.
 - b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - c. The average facial velocity of air through all natural draft openings shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all natural draft openings shall be into the enclosure.
 - d. All access doors and windows whose areas are not included in item 2 of this definition and are not included in the calculation of facial velocity in item 3 of this definition shall be closed during routine operation of the process.
 - e. The enclosures shall be designed and maintained to capture all emissions for discharge through a control device.
- The permittee shall equip the RCO combustion chamber and each biofilter bed with temperature sensors. Each sensor shall be located in a position that provides a representative temperature. Each temperature sensor shall have a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger. (40 CFR 63.2269(b)(1) and (2))

V. TESTING/SAMPLING

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

- 1. The permittee must conduct performance tests on all emission units in FGMACTDDDD for which 40 CFR Part 63, Subpart DDDD requires testing. The permittee must use one of the options specified in 40 CFR Part 63, Subpart DDDD, Table 4 and Table 5. (40 CFR 63.2262, 40 CFR 63.2271(a))
- 2. The permittee shall test the activity level of a representative sample of the RCO catalyst at least once each 12 months. (40 CFR Part 63, Subpart DDDD, Table 2(2), 40 CFR 63.2271(a))

- 3. The permittee shall conduct a repeat performance test for EUPRESS2S and EU3PRESS-AREA using the applicable method specified in 40 CFR Part 63, Subpart DDDD, Table 4, within 2 years following the previous performance test and within 180 days after each replacement of any portion of the Biofilter bed media with a different type of media or each replacement of more than 50 percent (by volume) of the Biofilter bed media with the same type of media. **(40 CFR Part 63, Subpart DDDD, Table 7, 40 CFR 63.2262)**
- 4. The permittee shall perform an electronic calibration of the temperature sensors in the biofilter beds and RCO catalyst beds at least semiannually, according to the procedures in the manufacturer's Owner's Manual. Following the electronic calibration the permittee shall conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading. (40 CFR 63.2269(b)(4))
- 5. The permittee shall conduct calibration and validation checks on any biofilter or RCO temperature sensor any time that sensor exceeds the manufacturer's specified maximum operating temperature range. Alternatively, the permittee may replace that temperature sensor with a new one. **(40 CFR 63.2269(b)(5))**
- At least quarterly, the permittee shall inspect temperature sensors in the biofilter and RCO and associated components and electrical connections for continuity, oxidation, and galvanic corrosion.
 (40 CFR 63.2269(b)(6))

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 and record the biofilter media bed temperature on each biofilter. The biofilter media bed temperature shall be calculated as a 24 hour block average as specified in 40 CFR 63.2270, based on evenly spaced temperature readings taken at a minimum rate of one reading per bed per 15-minute period. (R 336.1213(3), 40 CFR 63.2269(a) and (b), 40 CFR 63.2270)
- The permittee shall monitor and record the temperature of the RCO combustion chamber. At minimum the permittee shall record one temperature reading per 15-minute period. (R 336.1213(3), 40 CFR 63.2269(a) and (b), 40 CFR 63.2270)

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. Semiannual compliance report for 40 CFR Part 63, Subpart DDDD, including all information required by 40 CFR 63.2281(c), (d), and (e). To be submitted with the semiannual monitoring and deviation report required by Condition VII.2. **(40 CFR 63.2281(a))**
- An immediate startup, shutdown, and malfunction report, if actions taken in response were not consistent with an approved startup, shutdown, and malfunction plan. This report must be submitted by fax or telephone within two working days after starting actions inconsistent with the plan. Following this, the permittee shall provide all information required in 40 CFR 63.10(d)(5)(ii), in writing, within seven calendar days. (40 CFR 63.2281(a), 40 CFR Part 63, Subpart DDDD, Table 9(2))

- The permittee shall notify the AQD Technical Programs Unit Supervisor and District Supervisor no less than 60 calendar days before any performance test is scheduled to begin. (40 CFR 63.2280(c), 40 CFR 63.7(b)(1), R 336.2001(4))
- The permittee shall submit two copies of a Notification of Compliance Status, including the performance test results, one to the AQD Technical Programs Unit Supervisor and one to the AQD District Supervisor, within 60 calendar days following the completion of any performance test, as specified in 40 CFR 63.10(d)(2). (40 CFR 63.2280(d)(2), 40 CFR 63.10(d)(2), R 336.2001(5))

See Appendix 8-1

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall develop a written Startup, Shutdown, and Malfunction Plan, according to the provisions of 40 CFR 63.6(e)(3). (40 CFR 63.2250(c))
- 2. Following testing of the catalyst of the Regenerative Catalytic Oxidizer, as specified in Condition V.2, the permittee shall take any necessary corrective action to ensure that the catalyst is performing within its design range. (40 CFR Part 63, Subpart DDDD, Table 7(4))
- 3. For each temperature monitoring device, such as the temperature sensors in the RCO and biofilter, the sensors must meet the following requirements: (40 CFR 63.2269(b)(1, 2, and 3)
 - a. Each sensor must be located in a position which provides a representative temperature.
 - b. Each sensor must have a minimum accuracy of 4°F or 0.75% of the temperature value, whichever is larger.
 - c. If a chart recorder is used, it must have sensitivity with minor divisions of not more than 20°F.
- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDD: National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products by the initial compliance date. (40 CFR Part 63, Subparts A and DDDD)

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).

FGBOILERS1&2 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two boilers fueled by natural gas. Each boiler is rated at 80,000 pounds per hour of steam production.

Emission Unit: EUBOILER#1, EUBOILER#2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.10 lb/MMBtu	Test Protocol*	EUBOILER#1, EUBOILER#2	SC V.1	40 CFR 60.44b(a)
2. NOx	11.53 lb/hour	Test Protocol*	EUBOILER#1, EUBOILER#2	SC V.1	R 336.1205
*Test protocol sh	all determine ave	raging time		•	

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall only combust natural gas in FGBOILERS1&2.² (R 336.1205(3))
- 2. The permittee may burn the exhaust from the sludge dryer EUSLUDGEDEHYDRTR in either EUBOILER#1 OR EUBOILER#2.1 (R 336.1901)

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 permittee shall verify the NOx emission rates from EUBOILER#1 and from EUBOILER#2 every five years. All testing, sampling, analytical and calibration procedures performed under this condition shall be performed in accordance with applicable Federal Reference Methods, 40 CFR Part 60, Appendix A.² (R 336.1213(3), R 336.2001)

VI. MONITORING/RECORDKEEPING

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

NA

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)) The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
- 4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
- The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))
- 6. Unless the conversion is completed and notification submitted before issuance of this Renewable Operating Permit, the permittee shall provide written notification when conversion of EUBOILER#1 and EUBOILER#2 to natural gas firing only has been completed. Notification shall be provided no more than 14 days after the boilers have become operational on natural gas and shall provide notice that the boilers are operational only on natural gas. (R 336.1213(3))

See Appendix 8-1

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVBOIL123-STK58	86.4 ²	135 ²	R 336.1331

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDDD for Major Sources: Industrial Boiler and Process Heaters. (40 CFR Part 63, Subpart A, 40 CFR Part 63, Subpart DDDDD, 40 CFR 63.7490)

Footnotes:

¹This 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).

FGPRESSES FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Presses 1, 3, and their associated board coolers

Emission Units: EUPRESS2S, EUPRESS3-AREA

POLLUTION CONTROL EQUIPMENT

#1 Biofilter and #3 Biofilter

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Particulate Matter	0.10 pounds per 1000 pounds exhaust gasses on a dry gas basis ²		FGPRESSES	SC V.1	R 336.1331
Particulate Matter	29.3 pounds per hour ²	Test Protocol*	EUPRESS2S	SC VI.2 SC VI.3 SC VI.4	R 336.1331

*Test protocol shall specify averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EUPRESS2S and/or EU3PRESS-AREA unless the Biofilter controlling each emission unit that is operating is installed, maintained, and operated in a satisfactory manner.¹ (R 336.1901)
- 2. The permittee shall not operate EUPRESS2S and/or EU3PRESS-AREA except as specified in a MAP, approved by the AQD, setting forth operational parameters including acceptable ranges of bed temperature, differential pressure, and water flow for the No. 1 and No. 3 Biofilters. (R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall install and maintain a system to continuously monitor the water flow, in gallons per minute, through the spray tower on the Humidification System on the No. 3 Biofilter. (R 336.1213(3), R 336.1911)
- 2. The permittee shall install and maintain a line pressure gauge to determine the water pressure on the Humidification System on the No. 1 Biofilter. (R 336.1213(3), R 336.1911)

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- 3. The permittee shall install a system to continuously monitor the pressure drop across the Biofilter media beds for both No. 1 and No. 3 Biofilters. (R 336.1213(3), R 336.1911, 40 CFR 63.2240)
- 4. The permittee shall install a system to continuously monitor the temperature of the Biofilter media beds for both No. 1 and No. 3 Biofilters. (R 336.1213(3), R 336.1911)

V. TESTING/SAMPLING

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

 The permittee shall verify the PM emission rate from FGPRESSES by conducting a stack test every five years. All testing, sampling, analytical and calibration procedures performed under this condition shall be performed in accordance with applicable Federal Reference Methods, 40 CFR Part 60, Appendix A. (R 336.1213(3), R 336.2001, R 336.1910)

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 record the pressure drop across the Biofilter media beds for both No. 1 and No.3 Biofilters at startup. Startup is as defined in the MAP for No. 1 and No. 3 Biofilters. (R 336.1213(3))
- 2. The permittee shall record the pressure drop across the Biofilter media beds for both No. 1 and No.3 Biofilters at least once per shift. (R 336.1213(3))
- 3. The permittee shall monitor and record water flow through the spray tower on the humidification system of the No. 3 Biofilter and water pressure on the humidification system of the No. 1 Biofilter. All items specified in the MAP for the No. 1 and No. 3 Biofilters shall be recorded once per shift while operating. (R 336.1213(3))
- 4. The permittee shall record the 24 hour block average temperature of the Biofilter media beds for both the No. 1 and No. 3 Biofilters. (R 336.1213(3), 40 CFR 63.2270(e))

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 two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**
- The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SVS2SCOOLR-STK28	64 ¹	100 ¹	R 336.1901
2.	SV#3PRESS-STK68	48 ¹	103 ¹	R 336.1901

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall implement and maintain a written MAP for No. 1 and No. 3 Biofilters. The plan shall include, for each of the Biofilters individually:
 - a. The minimum gallons per minute of water recirculation through the spray tower system on the humidification system of the Biofilter:
 - b. The minimum pressure drop across the Biofilter media beds at startup;
 - c. The minimum pressure drop across the Biofilter media beds under normal operating conditions;

The plan must be submitted to and approved by the AQD in advance. Changes to the plan may be made upon written approval by the AQD. (R 336.1911)

 If the MAP for the No. 1 and No. 3 Biofilters does not adequately prevent, detect, and correct malfunctions or equipment failures that result in emissions exceeding any applicable emission limit, the permittee shall prepare a revised MAP which addresses these deficiencies and shall submit the revised MAP to the AQD for approval. (R 336.1911)

Footnotes:

¹This 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).

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FGPREDRYER-BAKEOVEN FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Predryer and Bake Oven for No. 3 press line

Emission Unit: EU3PREDRYER, EU3BAKEOVEN

POLLUTION CONTROL EQUIPMENT

Regenerative Catalytic Oxidizer (RCO)

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Particulate matter	0.10 pounds per 1000 pounds of exhaust gasses on a dry gas basis	Test Protocol*	FGPREDRYER- BAKEOVEN	SC V.1	R 336.1331

*Test protocol shall specify averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate FGPREDRYER-BAKEOVEN unless the RCO is installed, maintained, and operated in a satisfactory manner. (R 336.1911, 40 CFR 63.2240(b))
- 2. The permittee shall operate FGPREDRYER-BAKEOVEN in compliance with the MAP for EU3PREDRYER, EU3BAKEOVEN, and the RCO. (R 336.1911)
- When in operation, the RCO shall operate at a temperature such that the 3 hour block average catalytic oxidizer temperature is above the minimum temperature established during an approved performance test. (R 336.1901, R 336.1911, 40 CFR 63.2240(b), Table 2 to Subpart DDDD of 40 CFR Part 63)

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

1. The permittee shall equip the combustion chamber of the Regenerative Catalytic Oxidizer with a working temperature gauge. (R 336.1901)

V. TESTING/SAMPLING

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

 The permittee shall verify the PM emission rate from FGPREDRYER-BAKEOVEN by conducting a stack test every five years. All testing, sampling, analytical and calibration procedures performed under this condition shall be performed in accordance with applicable Federal Reference Methods, 40 CFR Part 60, Appendix A. (R 336.1213(3), R 336.2001)

VI. MONITORING/RECORDKEEPING

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

1. Permittee shall continuously monitor the RCO temperature and shall record the 3 hour block average catalytic oxidizer temperature. (R 336.1901, 40 CFR 63.2240(b))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
- 5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**
- The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain a written MAP for FGPREDRYER-BAKEOVEN and the RCO. This plan shall include the temperature range, established during stack testing, that is acceptable for the RCO when it is in operation. The plan must be approved by the AQD. Changes to the plan may be made with written approval by the AQD. (R 336.1901, R 336.1911, 40 CFR 63.2440(b))

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2. If the MAP for FGPREDRYER-BAKEOVEN and the RCO does not adequately prevent, detect, and correct malfunctions or equipment failures that result in emissions exceeding any applicable emission limit, the permittee shall prepare a revised MAP which addresses these deficiencies and shall submit the revised MAP to the AQD for approval. (R 336.1911)

Footnotes:

¹This 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).

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FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(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: EUCOLDCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(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(r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
- 3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))

- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
 - c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

V. TESTING/SAMPLING

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(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))

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUBOILER#3	40 CFR Part 60, Subpart Dc	40 CFR Part 60, Subpart Dc only applies to small industrial boilers for which construction began on or after June 9, 1989. EUBOILER#3 was installed before this date, in 1961.
FGBOILERS1&2	40 CFR Part 60, Subpart Dc	40 CFR Part 60, Subpart Dc only applies to small industrial boilers for which construction began on or after June 9, 1989. The boilers in FGBOILERS1&2 were installed before this date, in 1959.

APPENDICES

Appendix 1.1 Acronyms and Abbreviations

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

Appendix 2-1. Schedule of Compliance

The permittee certified in this ROP application that this stationary source is in compliance with all applicable requirements of this ROP except for the following: The provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63, Subpart DDDD, including 40 CFR 63.2230 through 40 CFR 2292 and the appendices thereto. As a result, the permittee was required to submit a Schedule of Compliance as defined in Rule 119(a), pursuant to Rule 210(2) and Rule 213(4).

A Schedule of Compliance for any applicable requirements that the permittee is not in compliance with at the time of the ROP issuance is supplemental to, and shall not sanction non-compliance with, the underlying applicable requirements on which it is based.

The permittee shall adhere to this schedule of compliance and submit the required certified progress reports accordingly.

Compliance Plan & Schedule of Compliance

At the time of the issuance of this permit, the company is in negotiations with the United States Environmental Protection Agency to establish a compliance plan and schedule of compliance as part of a Consent Order. Once the Consent Order is entered into, within 90 days the permittee shall apply to the AQD for a modification to this ROP to incorporate the Compliance Plan and Schedule of Compliance information from the Consent Order into the ROP.

Appendix 3-1. 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 4-1. 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 5-1. Testing Procedures

The permittee shall use the following approved test plans, procedures, and averaging to measure the pollutant emissions for the applicable requirements referenced in EUBOILER#3.

Wastewater Sludge

The following table lists the maximum allowed concentrations of the listed contaminants for wastewater treatment sludge to be burned in EUBOILER#3.

Appendix 5-1A					
Parameter	Extract Concentration Milligrams Per Liter				
Arsenic	5.0				
Barium	100.0				
Cadmium	1.0				
Chromium	5.0				
Lead	5.0				
Mercury	0.2				
Selenium	1.0				
Silver	5.0				

Miscellaneous waste oil and clarifier oil:

The following table lists maximum allowed concentrations of the listed contaminants and the minimum flash point for miscellaneous waste oil and clarifier oil to be burned in EUBOILER#3.

Appendix 5-1B				
Parameter	Allowed Levels			
Arsenic	Less than 5 parts per million			
Cadmium	Less than 2 parts per million			
Chromium	Less than 10 parts per million			
Lead	Less than 100 parts per million			
Flash point	Greater than 100 degrees Fahrenheit			
Total halogens	Less than 4,000 parts per million			
PCBs	Less than 2 parts per million			
Sulfur	Less than 1 percent at 18,000 BTU/lb			

Appendix 6-1. 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-B1476-2009. 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-B1476-2009 is being reissued as Source-Wide PTI No. MI-PTI-B1476-2015

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201000042	Changes to CAM requirements	FGBOILER123
NA	201200009 July 1, 2013	Removal of Stacks SVBOIL3-STK57 and SVBOIL-1&2-STK56.	FGBOILER123
4-15	201500134	Conversion of EUBOILER#1 and EUBOILER#2 to natural gas firing only	FGBOILER123, FGBOILER12, EUBOILER#3
4-15A	201500185*	Minor modification- revision of the exhaust stack dimensions specified in 4-15	FGBOILER123, FGBOILER12, EUBOILER#3

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B1476-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
208-15	201600008/April 6, 2016	Incorporate PTI No. 208-15 into Section 1 of the ROP. PTI No. 208-15 is to remove a unit-specific visible emission limitation for the presses.	FGPRESSES

Appendix 7-1. Emission Calculations

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 8-1. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, 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.

SECTION 2—AMERICAN PROCESS INCORPORATED

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 percent 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 states 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. (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(8))

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, MDEQ.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, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R 336.1201(4))

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT 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
EULIME	Lime storage and handling with passive vent filter	04/25/2012	FGAPIFACILITY
EUPRETREAT	Feedstock pretreatment: Three Vapor Compression Evaporation (VCE) units, reverse osmosis separator, and associated equipment, one stack, uncontrolled	04/25/2012	FGAPIFACILITY FGNSPSVVa
EUYEASTPROP	Yeast propagation system: One 21,300 gallon yeast recycle tank, controlled by facility wet scrubber	04/25/2012	FGETHANOL FGAPIFACILITY FGNSPSVVa
EUETHANOLFERM	Ethanol fermentation process: Four 62,500 gallon fermenters and one 72,000 gallon beer well, controlled by facility wet scrubber	04/25/2012	FGETHANOL FGAPIFACILITY FGNSPSVVa FGMON
EUBEERCOLUMN	Beer column to separate ethanol from yeast and residual sugars, controlled by facility wet scrubber	04/25/2012	FGETHANOL FGAPIFACILITY FGNSPSVVa FGMON
EURECTIFIER	Rectifier column to separate ethanol from water, controlled by facility wet scrubber	04/25/2012	FGETHANOL FGAPIFACILITY FGNSPSVVa FGMON
EUMOLSIEVE	Two vapor phase molecular sieves to produce 200 proof ethanol. Emissions are controlled by the wet scrubber.	04/25/2012	FGETHANOL FGAPIFACILITY FGNSPSVVa FGMON
EUTANK1	5,880 gallon ethanol shift tank, uncontrolled.	04/25/2012	FGAPIFACILITY
EUTANK3	5,880 gallon secondary ethanol shift tank, uncontrolled	04/25/2012	FGAPIFACILITY
EUTANK4	17,100 gallon ethanol product tank, uncontrolled	04/25/2012	FGAPIFACILITY
EUETHLOAD	Denatured ethanol truck load out, uncontrolled	04/25/2012	FGAPIFACILITY FGMON

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ROP No: MI-ROP-B1476-2015a Expiration Date: December 21, 2020 PTI No: MI-PTI-B1476-2015a

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSLUDGEDEHYDRTR	Paddle dryer, dries waste water treatment sludge. Controlled by a venturi scrubber, condenser, and one of the following boilers: EUBOILER#1, EUBOILER#2, and EUBOILER#3. All three boilers are located at, and operated by, Decorative Panels International (DPI).	07/27/2000 Modified 03/12/2001 11/08/2007	NA

EULIME EMISSION UNIT CONDITIONS

DESCRIPTION

Lime storage and handling. Lime is delivered by truck and transferred to a storage silo using the truck mounted blower. The silo is equipped with a passive vent filter to control emissions.

Flexible Group ID: FGAPIFACILITY

POLLUTION CONTROL EQUIPMENT

Passive vent filter on silo

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Visible Emissions	20% opacity	6 minute average	Lime silo	SC V.1	R 336.1301

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

 The permittee shall not transfer lime into the lime storage silo unless the lime storage silo vent filter is installed, maintained, and operated in a satisfactory manner.² (R 336.1205(1), R 336.1301, R 336.1331, R 336.1901, R 336.1910)

V. TESTING/SAMPLING

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

 The permittee shall perform and record the results of a 6-minute non-certified visible emission check on the lime silo vent at least once during each filling operation. The visible emission check shall simply verify the presence or absence of visible emissions and need not follow the procedures specified in USEPA Reference Test Method 9. If visible emissions are observed, the permittee shall immediately take corrective actions as specified in the facility Malfunction Abatement Plan. (R 336.1910, 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))

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- The permittee shall keep, in a satisfactory manner, records of the amount of lime transferred to the lime storage silo. The permittee shall keep all records on file and make them available to the AQD upon request.² (R 336.1205(1), R 336.1901, R 336.1910, R 336.1213(3))
- 2. The permittee shall keep results of the visible emissions checks and records of any corrective actions taken in response to excess emissions. The permittee shall keep this information on file and make them available to the AQD 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 8-2

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	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).

EUETHLOAD EMISSION UNIT CONDITIONS

DESCRIPTION

Denatured ethanol truck load-out. Gasoline, the denaturant, is added to the 200 proof ethanol using an inline pump immediately before loading into the trucks.

Flexible Group ID: FGAPIFACILITY

POLLUTION CONTROL EQUIPMENT

Submerged fill pipes on trucks loaded

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.	Total ethanol and denaturant throughput	1.17 million gallons per year ²	12-month rolling time period as determined at the end of each calendar month	EUETHLOAD		R 336.1205(1) R 336.1225 R 336.1702(a) R 336.1901 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
2.	Denaturant throughput	45,000 gallons per year ²	12-month rolling time period as determined at the end of each calendar month	EUETHLOAD		R 336.1205(1) R 336.1225 R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not load any tanker trucks with ethanol, gasoline, or a blend of the two at the API facility unless each tanker truck is equipped with submerged fill piping.² (R 336.1205(1), R 336.1225, R 336.1702(a))

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))

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 record, in a satisfactory manner, the denaturant, ethanol, and combined ethanol and denaturant throughput for EULETHLOAD for each month and 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep these records on file and make them available to the Department upon request.² (R 336.1205(1), R 336.1225, R 336.1702(a))

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))

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This 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).

EUSLUDGEDEHYDRTR EMISSION UNIT CONDITIONS

DESCRIPTION

Paddle Dryer for drying wastewater treatment sludge

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Venturi Scrubber, Condenser, EUBOILER#1 and EUBOILER#2. (Both boilers are located in and operated by Decorative Panels International (DPI) and are covered in Section 1 of this Renewable Operating Permit.)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Requirements
Particulate matter	0.10 pounds per 1000 pounds of exhaust gasses, calculated on a dry basis ²		EUSLUDGEDEHYD RTR when controlled only by Venturi Scrubber and Condenser		R 336.1331(1)(c)
Particulate matter	0.82 pounds per hour ²	NA	EUSLUDGEDEHYD RTR	SC VI.1 SC VI.2	R 336.1331(1)(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The minimum water feed rate to the venturi scrubber shall be 40 gallons per minute.² (R 336.1910)
- 2. The minimum water feed to the condenser shall be that for which compliance with acceptable odor thresholds was demonstrated. The minimum water feed to the condenser shall be specified in the MAP for EUSLUDGEDEHYDRTR.¹ (R 336.1901)
- 3. The permittee shall not operate EUSLUDGEDEHYDRTR unless the condenser and venturi scrubber are installed, maintained and operated in a satisfactory manner, except as otherwise allowed by the MAP for EUSLUDGEDEHYDRTR.² (R 336.1911)
- 4. The permittee shall use only steam as the heat transfer medium in EUSLUDGEDEHYDRTR.¹ (R 336.1901)

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5. Exhaust gasses from EUSLUDGEDEHYDRTR shall be burned in EUBOILER#1, EUBOILER#2, or EUBOILER#3, except as otherwise allowed by the MAP for EUSLUDGEDEHYDRTR.¹ (R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall maintain a pressure relief valve at the inlet of EUSLUDGEDEHYDRTR. The pressure relief valve shall be set to prevent steam pressure from exceeding 200 PSIG.¹ (R 336.1901)

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 and record the water flow through the venturi scrubber in gallons per minute, on a continuous basis, in a manner and with instrumentation acceptable to the AQD.² (R 336.1213(3), R 336.1910)
- 2. The permittee shall monitor and record the water flow through the condenser in gallons per minute, on a continuous basis, in a manner and with instrumentation acceptable to the AQD.² (R 336.1213(3), R 336.1910)

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 8-2

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBOIL123-STK58	86.4 ¹	135 ¹	R 336.1901
SVSTK95	8.4 ¹	69 ¹	R 336.1901

IX. OTHER REQUIREMENT(S)

1. The minimum water feed rates to the condenser and to the venturi scrubber shall be maintained electronically in the facility computer system or posted near the facility operator station(s).² (R 336.1910)

- 2. The permittee shall implement and maintain a written MAP for EUSLUDGEDEHYDRTR. The plan shall be subject to approval by the AQD. Changes to the plan may be made upon written approval by the AQD.² (R 336.1911)
- 3. If the MAP for EUSLUDGEDEHYDRTR does not adequately prevent, detect, and correct malfunctions or equipment failures resulting in emissions exceeding any applicable emission limitation, then the permittee shall revise the MAP to address the inadequacies and shall submit the revised MAP to the AQD for approval.² (R 336.1911)
- 4. Compliance of EULUDGEDEHYDRTR exhaust during EUBOILER#1, EUBOILER#2, and/or EUBOILER#3 upset conditions shall be determined as described in the MAP, with exhaust from EUSLUDGEDEHYDRTR vented through SVSTK95.¹ (**R 336.1901**)

<u>Footnotes</u>:

¹This 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 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
FGETHANOL	Ethanol fermentation and purification equipment vented to the process wet scrubber.	EUYEASTPROP EUETHANOLFERM EUBEERCOLUMN EURECTIFIER EUMOLSIEVE
FGNSPSVVa	All pumps, valves, and pressure relief devices in light liquid and heavy liquid service; all valves and pressure relief devices in gas/vapor service; each sampling connection; and each open ended valve or line and all associated closed vent systems and control devices.	All equipment subject to 40 CFR Part 60, Subpart VVa including: EUYEASTPROP EUETHANOLFERM EUBEERCOLUMN EURECTIFIER EUMOLSIEVE
FGMON	Miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source as defined in section 112(a) of the Clean Air Act and that meet all the criteria specified in 40 CFR Part 63, Subpart FFFF (40 CFR), 63.2435. Specified processes are further defined in 40 CFR 63.2440.	All equipment subject to 40 CFR Part 63, Subpart FFFF including: EUETHANOLFERM EUBEERCOLUMN EURECTIFIER EUMOLSIEVE EUETHLOAD
FGAPIFACILITY	All process equipment source-wide at the American Process Incorporated facility including equipment covered by other permits, grand-fathered equipment and exempt equipment. Does not include EUSLUDGEDEHYDRTR which is located in the adjacent Decorative Panels International facility, but which is operated by American Process International as part of the wastewater treatment system.	EUPRETREAT EUYEASTPROP EUETHANOLFERM EUBEERCOLUMN EURECTIFIER EUMOLSIEVE, EULIME EUTANK1 EUTANK3 EUTANK4 EUETHLOAD

FGETHANOL FLEXIBLE GROUP CONDITIONS

DESCRIPTION:

Ethanol fermentation and purification equipment vented to the process wet scrubber.

Emission Units: EUYEASTPROP, EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, EUMOLSIEVE

POLLUTION CONTROL EQUIPMENT

Wet scrubber CE002

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.6 lb per hour ²	NA	FGETHANOL	SC VI.3	R 336.1702(a) R 336.1901 R 336.1205(1)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any equipment in FGETHANOL unless the wet scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the scrubber liquid flow rate in the range identified in the MAP as constituting satisfactory operation.² (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.1205(1))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall equip and maintain FGETHANOL with a wet scrubber. (R 336.1702(a), R 336.1901)
- 2. The permittee shall equip and maintain the wet scrubber with a liquid flow rate indicator capable of accurately indicating the scrubber liquid flow rate over the entire range of flow rates that constitutes satisfactory operation, as described in the MAP.² (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.1205(1))

V. TESTING/SAMPLING

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

1. The permittee may be required to verify and quantify emission rates of VOC from the wet scrubber exhaust of FGETHANOL by testing, at the owner's expense, in accordance with AQD requirements. (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 monitor, in a satisfactory manner, the wet scrubber liquid flow rate on a continuous basis.² (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.1205(1))
- 2. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1), R 336.1225, R 336.1702(a), R 336.1901)
- 3. The permittee shall record daily, in a satisfactory manner, the wet scrubber liquid flow rate to demonstrate compliance with the VOC emission rate limit listed in SC I.1. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1), R 336.1225, R 336.1702(a))
- 4. The permittee shall calculate, in a satisfactory manner, VOC emission rates for FGETHANOL to demonstrate compliance with the VOC emission rate limit listed in SC I.1. The emission rate may be calculated based upon monthly records, prorated to an hourly rate. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1225, R 336.1702(a), R 336.1205)

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 8-2

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	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).

FGNSPSVVa FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All pumps, valves, and pressure relief devices in light liquid and heavy liquid service; all valves and pressure relief devices in gas/vapor service; each sampling connection; and each open ended valve or line and all associated closed vent systems and control devices.

Emission Units: EUPRETREAT, EUYEASTPROP, EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, EUMOLSIEVE

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate closed vent systems and control devices used to comply with 40 CFR Part 60, Subpart VVa at all times when emissions may be vented to them. **(40 CFR 60.482-10a(m))**

Valves, Bleed Lines, Open Ended Lines:

- 1. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.² (40 CFR 60.482-6a(b))
- 2. When a double block-and-bleed system is used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall be sealed with a cap, blind flange, plug, or second valve at all other times.² (40 CFR 60.482-6a(c))
- Any valve in gas/vapor or light liquid service that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of SC V.5 and V.6 provided that the valve has no external actuating mechanism in contact with the process fluid and is operated with emissions less than 500 ppm above background. (40 CFR 60.482-7a(f)(1), 40 CFR 60.482-7a(f)(2))

4. The permittee may elect to comply with an allowable percentage of valves leaking of equal to or less than 2.0 percent. (40 CFR 60.483-1a(a), 40 CFR 60.483-1a(d))

Pressure Relief Devices in Gas/Vapor Service:

- Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background.² (40 CFR 60.482-4a(a))
- After each pressure release, the pressure relief shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background as soon as practicable but no later than 5 calendar days after the pressure release, except as provided in Delay of Repair, SC IX.6-11.² (40 CFR 60.482-4a(b)(1))
- 3. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device is exempted from the requirements of SC III.6, III.7 and V.13.² (40 CFR 60.482-4a(c))
- 4. Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of SC III.6, III.7, and V.13 provided that a new rupture disk is installed upstream of the pressure relief device as soon as practicable but no later than 5 calendar days after each pressure release, except as provided in in Delay of Repair, SC IX.6-11. (40 CFR 60.482-4a(d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

Compressors:

- 1. Any compressor must be designed according to one of the following specifications: : (40 CFR 60.482-3a(a), 40 CFR 60.482-3a (b), 40 CFR 60.482-3a (c), 40 CFR 60.5400(a), 40 CFR 60.482-3a(i)(1))
 - a. Be designated and demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background, **OR**
 - b. Be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere. The barrier fluid system shall be in heavy liquid service or shall not be in VOC service. Each compressor seal system shall be
 - i. Operated with a barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or
 - Equipped with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system connected by a closed vent system to a control device that complies with the requirements of 40 CFR 60.482-10a; or
 - iii. Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.
- Each compressor barrier fluid system as described in Condition IV.1 shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both. (40 CFR 60.482-3a(d), 40 CFR 60.482-3a(e), 40 CFR 60.482-3a(f))

Open-Ended Valves or Lines:

 Except as provided in 40 CFR 60.482-6a(d), each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations required process fluid flow through the open ended valve or line. (40 CFR 60.482-6a(a))

V. TESTING/SAMPLING

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

1. Each pump in light liquid service, each compressor, and each valve in gas/vapor service and in light liquid service designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background shall be tested for compliance initially upon designation, annually, and at other times requested by the AQD. (40 CFR 60.482-2a(e), 40 CFR 60.482-3a(i)(2), 40 CFR 60.482-7a(f)(3))

Pumps in Light Liquid Service:

- Except as provided in SC V.4, each pump in light liquid service shall be monitored monthly to detect leaks. A pump that begins operation in light liquid service after the initial startup date of the process unit must be monitored for the first time within thirty days after the end of its startup period except for a pump that replaces a leaking pump and except as provided in SC V.4. A leak is detected when an instrument reading of 2,000 ppm or greater is measured.² (40 CFR 60.482-2a(b)(1)(ii))
- 2. Except as provided in SC V.4, each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If liquids are dripping from the pump seal, the permittee shall either designate the visual indications as a leak and repair the leak within 15 days of detection by eliminating the visual indications of liquids dripping or monitor the pump within 5 days and repair the leak using the procedures in SC IX.2.² (40 CFR 60.482-2a(a)(2), 40 CFR 60.482-2a(b)(2), 40 CFR 60.482-2a(d)(4))
- 3. Any pump in light liquid service is exempt from the testing requirements of SC V.2 and SC V.3 provided it meets one of the following stipulations:
 - a. The pump is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, provided that the pump has no externally actuated shaft penetrating the pump housing and is demonstrated to be operating with no detectable emissions. **(40 CFR 60.482-2a(e))**
 - b. The pump is equipped with a closed vent system capable of capturing and transporting any leakage from the seal or seals to a process or to a fuel gas system or a control device. **(40 CFR 60.482-2a(f))**
 - c. The pump is equipped with a dual mechanical seal system that includes a barrier fluid system, provided that the pump meets the following: (40 CFR 60.482-2a(d)(1), (2), (3), (4), and (5))
 - i. Each dual mechanical seal system is:
 - A. Operated with no barrier fluid at a pressure that is all times greater than the pump stuffing box pressure; or
 - B. Equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed vent system to a control device that complies with the requirements of 40 CFR 60.482-10; or
 - C. Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.
 - ii. The barrier fluid system is in heavy liquid service or is not in VOC service.
 - iii. Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.
 - A. Each sensor shall be checked daily or equipped with an audible alarm.
 - B. The permittee determines, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both.
 - C. If the sensor indicates failure of the seal system, the barrier fluid system, or both, based on criterion established, a leak is detected and shall be repaired as specified in SC IX.2.
 - iv. Each pump is checked by visual inspection, each calendar week, for indications of liquids dripping from the pump seals. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, the permittee shall perform the following procedures prior to the next required inspection.
 - A. Monitor the pump within 5 business days to determine if there is a leak of VOC in the barrier fluid; or
 - B. Designate the visual indications of liquids dripping as a leak.

Valves in Gas/Vapor Service and in Light Liquid Service:

Each valve in gas/vapor service shall be monitored monthly to detect leaks. A leak is detected when an instrument reading of 500 ppm or greater is measured. If a leak is not detected for 2 successive months, the valve may be monitored the first month of every quarter, beginning the next quarter, until a leak is detected. As an alternative to monitoring all of the valves in the first month of the quarter, the permittee may elect to subdivide the process unit into two or three subgroups and monitor each subgroup in a different month during the quarter, provided each subgroup is monitored every three months. When a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months. The permittee may elect to comply with the alternative work practices specified in SC V.8 and SC V.9.² (40 CFR 60.482-7a(1), 40 CFR 60.482-7a(b), 40 CFR 60.482-7a(c)(1)(i) and (ii), 40 CFR 60.482-7a(c)(2), 40 CFR 60.482-3a(a)(1))

This requirement does not apply to the following:

- a. Any valve in gas/vapor or light liquid service that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, provided the valve has no external actuating mechanism in contact with the process fluid and is operated with emissions less than 500 ppm above background (40 CFR 60.482-7a(f)(1), 40 CFR 60.482-7a(f)(2))
- b. A facility where the permittee has chosen the alternative method of demonstrating compliance by staying within the allowable percentage of valves leaking of equal to or less than 2.0 percent, as allowed by (40 CFR 60.482-7a(f)(1), 40 CFR 60.482-7a(f)(2))
- c. Any valve designated as Unsafe to Monitor; see SC IX.12
- d. Any valve designated as Unsafe to Monitor or Difficult to Monitor, see SC IX.16
- 2. Any valve that begins operation in gas/vapor service or light liquid service after the initial startup date for the process unit must be: (40 CFR 60.482-7a(a)(2))
 - a. Monitored as in Condition V.5. The valve must be monitored for the first time within 30 days after the end of its startup period to ensure proper installation; or
 - b. If the existing valves in the process unit are monitored in accordance with SC III.9, SC V.7, or SC V.8, count the new valve as leaking when calculating the percentage of valves leaking as described in 40 CFR 60.483-2a(b)(5). If less than 2.0 percent of the valves are leaking for that process unit, the valve must be monitored for the first time during the next scheduled monitoring event for existing valves in the process unit or within 90 days, whichever comes first

This requirement does not apply to the following:

- A valve that replaces a leaking valve
- A facility where the permittee has chosen the alternative method of demonstrating compliance by staying within the allowable percentage of valves leaking of equal to or less than 2.0 percent, as allowed by (40 CFR 60.482-7a(f)(1), 40 CFR 60.482-7a(f)(2))
- Any valve designated as Unsafe to Monitor, see Condition IX.12
- Any valve designated as Unsafe to Monitor or Difficult to Monitor, see Condition IX.16
- 3. Any valve in gas/vapor or light liquid service that is designated as unsafe-to-monitor shall be monitored as frequently as practicable during safe-to-monitor times and any valve that is designated as difficult-to-monitor shall be monitored at least once per calendar year. (40 CFR 60.482-7a(g)(2), 40 CFR 60.482-7a(h)(3))
- 4. If electing to comply with the alternative method of demonstrating compliance by staying within a percentage of leaking valves equal to or less than 2.0 percent, the permittee shall monitor for leaks initially upon designation, annually, and at other times requested by the AQD. (40 CFR 60.483-1a(b)(2)))
- 5. After initially complying with a quarterly leak detection program as specified in SC V.5 for 2 consecutive quarters with the percent of valves leaking equal to or less than 2.0, the permittee may begin to skip one of the quarterly leak detection periods for the valves in gas/vapor or light liquid service. If the percent of valves leaking is greater than 2.0, the permittee shall return to the schedule specified in SC V.5 but may elect to use this section again at a later date. (40 CFR 60.483-2a(a), (b)(1), (2), and (4))

- After initially complying with SC V.5 and SC V.9 for 5 consecutive quarterly leak detection periods with the percent valves equal to or less than 2.0, the permittee may begin to skip three of the quarterly leak detection periods for the valves in in gas/vapor or light liquid service. If the percent of valves leaking is greater than 2.0, the permittee shall return to the schedule specified in SC V.5 may elect to use this SC again at a later date. (40 CFR 60.483-2a(a), (b)(1), (3), and (4))
- 7. A valve that begins operation in gas/vapor service or light liquid service after the initial startup date for a process unit following one of the alternative standards in this section must be monitored in accordance with the initial schedules specified in SC V.5 or SC V.6, as appropriate, before the less frequent schedules allowed by SC V.9 or SC V.10 may be applied to that valve. **(40 CFR 60.483-2a(b)(7))**

Pressure Relief Valves

1. No later than 5 calendar days after a pressure release, the pressure relief device in gas/vapor service shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. (40 CFR 60.482-4a(b)(2))

Connectors

- The permittee shall monitor all connectors for process leaks. A leak is detected if an instrument reading of greater than or equal to 500 ppm is measured. The required period in which monitoring must be conducted shall be determined by the following schedule using the monitoring results from the preceding monitoring period. If a connector is found to be leaking, it shall be re-monitored once within 90 days after repair to confirm that it is not leaking: (40 CFR 60.482-11a(b)(3), 40 CFR 60.482-11a(b)(3)(iv), 40 CFR 60.482-11a(b))
 - a. If the percent leaking connectors in the process unit were greater than or equal to 0.5 percent, then monitor within 12 months (1 year).
 - b. If the percent leaking connectors in the process unit was greater than or equal to 0.25 percent but less than 0.5, then monitor within 4 years. The permittee may comply with the requirements of this paragraph by monitoring at least 40 percent of the connectors within 2 years of the start of the monitoring period, provided all connectors have been monitored by the end of the 4 year monitoring period.
 - c. If the percent leaking connectors in the process unit was less than 0.25 percent, then monitor as at least 50 percent of the connectors within four years of the start of the monitoring period; and
 - i. If the percent of leaking connectors calculated from the monitoring results is greater than or equal to 0.35 percent of the monitored connectors, the permittee shall monitor as soon as practical, but within the next 6 months, all connectors that have not yet been monitored during the monitoring period. At the conclusion of monitoring, a new monitoring period shall be started based on the percent of leaking connectors within the total monitored connectors; or
 - ii. If the percent of leaking connectors calculated from the monitoring results is less than 0.35 percent of the monitored connectors, the permittee shall monitor all connectors that have not yet been monitored within eight years of the start of the monitoring period.

VI. MONITORING/RECORDKEEPING

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

- 1. The following information pertaining to all equipment subject to the requirements of 40 CFR 60.482-1a to 60.482-10a shall be recorded in a log that is kept in a readily accessible location:² (40 CFR 60.486a(e))
 - a. A list of identification numbers for equipment subject to the requirements of 40 CFR Part 60, Subpart VVa.
 - b. A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of SC III.4, III.6, and V.4(a).
 - c. The designation of equipment as subject to the requirements of SC III.4, III.6, and V.4(a) shall be signed by the permittee.
 - d. A list of equipment identification numbers for pressure relief devices required to comply with SC III.6, III.7, and V.12.
 - e. The dates of each compliance test as required in SC V.1.
 - f. The background level measured during each compliance test.
 - g. The maximum instrument reading measured at the equipment during each compliance test.

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- h. A list of identification numbers for equipment in vacuum service.
- i. The date and results of the weekly visual inspection for indications of liquids dripping from pumps in light liquid service.
- j. Records of the information for monitoring instrument calibrations conducted:
 - i. Date of calibration and initials of the operator performing the calibration.
 - ii. Calibration gas cylinder identification, certification date, and certified concentration.
 - iii. Instrument scale(s) used.
 - iv. A description of any corrective action taken if the meter readout could not be adjusted to correspond to the calibration gas value.
 - v. Results of each calibration drift assessment.
- k. The connector monitoring schedule for each process unit as specified in SC V.13;
- I. Records of the release from a pressure relief device subject to SC III.9.
- 2. When a leak is detected from a pump in light liquid service, a compressor, a valve in gas/vapor service or light liquid service, a pressure relief device in light liquid service, or connectors, the following information shall be recorded in a log and shall be kept in a readily accessible location:² (40 CFR 60.486a(c))
 - a. The instrument and operator identification numbers and the equipment identification number.
 - b. The date the leak was detected and the dates of each attempt to repair the leak.
 - c. Repair methods applied in each attempt to repair the leak.
 - d. Maximum instrument reading measured at the time the leak is successfully repaired or determined nonrepairable, except when a pump is repaired by eliminating indications of liquids dripping.
 - e. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
 - f. The signature of the owner or operator whose decision it was that repair could not be affected without a process unit shutdown.
 - g. The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days.
 - h. Dates of process unit shutdown that occurs while the equipment is unrepaired.
 - i. The date of successful repair of the leak.
- 3. The following information pertaining to all valves, pumps, and connectors designated as unsafe-to-monitor or difficult-to-monitor shall be recorded in a log that is kept in a readily accessible location: ² (40 CFR 60.486a(f))
 - a. A list of identification numbers for valves that are designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe-to-monitor, and the plan for monitoring each valve.
 - b. A list of identification numbers for valves, pump, and connector that are designated as difficult-to-monitor, an explanation for each valve, pump, and connector stating why the valve, pump, and connector is difficult-to-monitor, and the schedule for monitoring each valve, pump, and connector.
- 4. The permittee shall record a schedule of monitoring and the percent of valves found leaking during each monitoring period for valves complying with SC V.10 and V.11. (40 CFR 60.486a(g), 40 CFR 60.482-1a(a))
- 5. The following information shall be recorded in a log that is kept in a readily accessible location: ² (40 CFR 60.486a(h))
 - a. Design criterion required in SC V.4(c) and IV.1 and explanation of the design criterion.
 - b. Any changes to the criterion and the reason for the changes.
- 6. The permittee shall keep the following information for closed vent systems and flares described in 40 CFR 60.482-10a in a readily accessible location: ² (40 CFR 60.486a(d))
 - a. Detailed schematics, design specifications, and piping and instrumentation diagrams.
 - b. The dates and descriptions of any changes in the design specifications.
 - c. A description of the parameter(s) monitored as required by 40 CFR 60.482-10a(e), to ensure the control devices are operated and maintained in conformance with the design and an explanation of why the parameter(s) was/were selected for the monitoring.
 - d. Periods when the closed vent systems and control devices are not operated as designed, including periods when a flare pilot light does not have a flame.
 - e. Dates of startups and shutdowns of the closed vent systems and control devices.

- 7. The permittee shall record the following information for each monitoring event required by SC V.1, SC V.2, SC V.5, SC V.10, SC V.11, SC V.13: (40 CFR 60.486a(a)(3))
 - a. Monitoring instrument identification.
 - b. Operator identification.
 - c. Equipment identification.
 - d. Date of monitoring.
 - e. Instrument reading.
- The permittee shall keep a record of the start date and end date of each monitoring period for each connector. (40 CFR 60.482-11a(b)(3)(v), 40 CFR 60.5400(a))
- If electing to comply with the alternative monitoring requirements listed in SC V.5 for valves in gas/vapor service and in light liquid service, the permittee shall keep records of the valves assigned to each subgroup. (40 CFR 60.482-7a(c)(ii))
- 10. Each sensor on a compressor barrier fluid system as described in SC IV.1 shall be checked daily or shall be equipped with an audible alarm. Based on design considerations and operating experience, the permittee shall determine a criterion that indicates failure of the seal system, barrier fluid system, or both. If the sensor indicates failure of the seal system, or both, based on the established criterion, a leak is detected. (40 CFR 60.482-3a(d), 40 CFR 60.482-3a(e), 40 CFR 60.482-3a(f))

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- The permittee shall submit semiannual reports. The reports shall be submitted at the same time as the semiannual reports required by SC VII.2. All semiannual reports shall contain the following information:² (40 CFR 60.487a(c))
 - a. Process unit identification;
 - b. For each month during the semiannual reporting period:
 - i. The number of valves for which leaks were detected as described in SC V.5, SC V.10, and SC V.11.
 - ii. The number of valves for which leaks were not repaired as required in SC IX.2.
 - iii. The number of pumps for which leaks were detected as described in SC V.2 and SC V.3.
 - iv. The number of pumps for which leaks were not repaired as required in SC IX.2.
 - v. The number of compressors for which leaks were detected as described in SC VI.10.
 - vi. The number of compressors for which leaks were not repaired as required in SC IX.2.
 - vii. The number of connectors for which leaks were detected as described in SC V.13.
 - viii. The number of connectors for which leaks were not repaired as required in SC IX.2.
 - c. Dates of process unit shutdowns which occurred within the semiannual reporting period.
 - d. Revisions to items reported if changes have occurred since the initial report or subsequent revisions to the initial report.
- 6. The permittee shall notify the AQD no less than 90 days prior to electing to comply with the alternative standard for valves of demonstrating the percentage of valves leaking is less than or equal to 2.0 percent, as allowed by 40 CFR 60.48207a(f)(1) and (2). (40 CFR 60.483-1a(b)(1), 40 CFR 60.483-2a(a)(2), 40 CFR 60.487a(d))

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and VVa, as they apply to the equipment in FGNSPSVVa (40 CFR Part 60, Subparts A and VVa)

Leak Detection and Repair:

- When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 days after it is detected, except as provided in SC IX.6-11 (Delay of Repair). A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.² (40 CFR 60.482-2a(c), 40 CFR 60.482-3a(g), 40 CFR 60.482-8a(c), 40 CFR 60.482-11a(d), 40 CFR 60.483-1a(b)(3), 40 CFR 60.482-7a(d))
- If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method, from a pressure relief device in light liquid service, the permittee shall monitor the equipment within 5 days or eliminate the visual, audible, olfactory, or other indication of a potential leak within 5 calendar days of detection.² (40 CFR 60.482-8a(a))
- 3. If any inaccessible connector in gas/vapor service or light liquid service is observed by visual, audible, olfactory, or other means, to be leaking, the visual, audible, olfactory, or other indications of a leak to the atmosphere shall be eliminated as soon as practicable. **(40 CFR 60.482-11a(f)(2))**
- 4. When a leak is detected from a pump in light liquid service, a valve in gas/vapor service or light liquid service, a compressor, or a connector in gas/vapor service or light liquid service, a weatherproof and visible identification marked with the equipment identification number, shall be attached to the leaking equipment. The identification on a valve may be removed after is has been monitored for 2 successive months as specified in SC V.5 and no leak has been detected during those 2 months. The identification on a connector may be removed after is has been monitored as specified in SC V.13 and no leak has been detected during that monitoring period. The identification equipment, except on a valve or connector, may be removed after is has been repaired.² (40 CFR 60.486a(b))

Delay of Repair

- The delay of repair for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of the equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.² (40 CFR 60.482-9a(a))
- 2. The delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service. (40 CFR 60.482-9a(b))

- 3. Delay of repair for valves and connectors will be allowed if:² (40 CFR 60.482-9a(c))
 - a. The permittee demonstrates that emissions of purged material resulting from the immediate repair are greater than the fugitive emissions likely to result from the delay of repair, and
 - b. When repair procedures are effected, the purged material is collected and destroyed or recovery in a control device complying with 40 CFR 60.482-10a.
- 4. Delay of repair beyond a process unit shutdown will be allowed for a valve, if the valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve

assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.² (40 CFR 60.482-9a(e))

- 5. Delay of repair for pumps will be allowed if repair requires the use of a dual mechanical seal system that includes a barrier fluid system and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.² (40 CFR 60.482-9a(d))
- 6. When delay of repair is allowed for a leaking pump, valve, or connector that remains in service, the pump, valve, or connector may be considered to be repaired and no longer subject to delay of repair requirements if 2 consecutive monthly monitoring instrument readings are below the leak definition.² (40 CFR 60.482-9a(f))

Unsafe to Monitor and Difficult to Monitor

- For any pump in light liquid service, any valve in gas/vapor service or in light liquid service, and any connector that is unsafe-to-monitor, the permittee shall demonstrate that the pump, valve, or connector is unsafe to monitor because monitor personnel would be exposed to an immediate danger as a consequence of complying with SC V.2, SC V.3, SC V.5, SC V.6, and SC V.13.² (40 CFR 60.482-2a(g)(1), 40 CFR 60.482-7a(g)(1), 40 CFR 60.482-11a(e)(1))
- 2. The permittee shall maintain a written plan that requires monitoring of pumps in light liquid service that are unsafe-to-monitor as frequently as practicable during safe-to-monitor times. (40 CFR 60.482-2a(g)(2))
- 3. The permittee shall maintain a written plan that requires monitoring of connectors in gas/vapor service or light liquid service that are unsafe-to-monitor as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures specified in SC IX.2 if a leak is detected. **(40 CFR 60.482-11a(e)(2))**
- 4. Any valve in gas/vapor service or in light liquid service that is designated as difficult-to-monitor or unsafe-tomonitor is exempt from the requirements of SC V.5 if:² (40 CFR 60.482-7a(g) and (h), 40 CFR 60.482-1a(a))
 - a. The permittee can demonstrate that the difficult-to-monitor valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface;
 - b. The process unit within which the difficult-to-monitor valve is located becomes an affected facility through 40 CFR 60.14 or 60.15 or the permittee designates less than 3.0 percent of the total number of valves as difficult-to-monitor, and
 - c. The permittee follows a written plan that requires monitoring of the difficult-to-monitor valve at least once per calendar year;
 - d. The permittee demonstrates that the valve is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with SC V.5;
 - e. The permittee follows a written plan that requires monitoring of the unsafe-to-monitor valve as frequently as practicable during safe-to-monitor times.

- Any connector in gas/vapor service or light liquid service that is inaccessible is exempt from the monitoring requirements of SC V.13 and the leak repair requirements of SC IX.2. An inaccessible connector is one that meets any of the following: (40 CFR 60.482-11a(f)(1))
 - a. Buried;
 - b. Insulated or in a manner that prevents access to the connector by a monitor probe;
 - c. Obstructed by equipment or piping that prevents access to the connector by a monitor probe;
 - d. Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold that would allow access to connectors up to 25 feet above the ground;
 - e. Inaccessible because it would require elevating the monitoring personnel more than 7 feet above a permanent support surface or would require the erection of scaffold; or
 - f. Not able to be accessed at any time in a safe manner to perform monitoring.

Footnotes:

¹This 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).

FGMON FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Miscellaneous Organic Chemical Manufacturing Process Units subject to National Emission Standards for Hazardous Air Pollutants, Subpart FFFF

Emission Unit: EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, EUMOLSIEVE, EUETHLOAD

POLLUTION CONTROL EQUIPMENT

Wet scrubber for EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, and EUMOLSIEVE

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Each closed vent system shall be operated to collect the regulated material vapors from the applicable emission points and route the collected vapors to a control device. (40 CFR 63.2450(e), 40 CFR 63.982(c), 40 CFR 63.983(a)(1))
- 2. Each closed vent system shall be operated at all times when emissions are vented to or collected by them. (40 CFR 63.2450(e), 40 CFR 63.982(c), 40 CFR 63.983(a)(2))
- 3. If any closed vent system has a bypass which is equipped with a flow indicator, as specified in SC IV.2, the permittee shall not operate the affected equipment unless the flow indicator is installed and operating properly. (40 CFR 63.2450(e), 40 CFR 63.982(c), 40 CFR 63.983(a)(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- Each closed vent system shall be designed to collect the regulated material vapors from the applicable emission points and route the collected vapors to a control device. (40 CFR 63.2450(e), 40 CFR 63.982(c), 40 CFR 63.983(a)(1))
- Except for safety equipment as specified in 40 CFR 63.983(3), the permittee shall equip any bypass lines which could divert a vent stream to the atmosphere with one of the following: (40 CFR 63.2450(e), 40 CFR 63.982(c), 40 CFR 63.983(a)(3))
 - a. A flow indicator, installed at the entrance to the bypass line, and capable of taking periodic readings and creating records of them
 - b. A car-seal or lock and key to secure the bypass line in the non-diverting position.

V. TESTING/SAMPLING

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

- Performance tests for the wet scrubber exhaust may be waived upon written application to the AQD if, in the judgment of the AQD, the wet scrubber exhaust is meeting any relevant standards on a continuous basis. (40 CFR 63.997(b)(2))
- 2. If the wet scrubber is counted upon for HAP reduction to meet any relevant standard, performance tests for the wet scrubber exhaust are required. Any performance tests shall be conducted at maximum representative operating conditions for the process, unless otherwise specified or approved by the AQD. During the performance test the permittee may operate the wet scrubber at maximum or minimum representative operating conditions, whichever results in lower emission reduction. Operation during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purposes of a performance test. (40 CFR 63.997(e)(1)(i))
- 3. For any Group 2 emission point that becomes a Group 1 emission point after the compliance date for the facility, an initial compliance demonstration, as specified in 40 CFR Part 63, Subpart FFFF, shall be conducted within 150 days after the switch occurs.² (40 CFR 63.2445(d))

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 retain copies of all initial notifications required by 40 CFR Part 63, Subpart FFFF. (40 CFR 63.2525(a))
- 2. The permittee shall keep each applicable record required by 40 CFR Part 63, Subpart A and in referenced subparts of 40 CFR Part 63.² (40 CFR 63.2525(a))
- 3. The permittee shall maintain the following records for each operating scenario:² (40 CFR 63.2525(b)(1) through (7))
 - a. A description of the process and process equipment used.
 - b. Identification of related process vents, wastewater point of determination (POD), storage tanks, and transfer racks
 - c. The applicable control requirements of 40 CFR Part 63, Subpart FFFF, including the level of required control, and for vents, the level of control of each vent
 - d. The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device
 - e. The process vents, wastewater POD, transfer racks, and storage tanks that are simultaneously routed to the control device or treatment process(es)
 - f. The applicable monitoring requirements of 40 CFR Part 63, Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process
 - g. Calculations and engineering analyses required to demonstrate compliance.
- 4. If any closed vent system is equipped with a bypass as specified in SC IV.2, the permittee shall maintain records of one of the following, as appropriate:
 - a. For a bypass equipped with a flow indicator, a reading at least once each fifteen minutes: Hourly records of whether the flow meter was operating and whether a diversion was detected at any time during the hour; records of all periods when the vent stream is diverted from the control device; and records of all periods when the flow meter is not operating. (40 CFR 63.983(a)(3)(i), 40 CFR 63.983(b)(4)(i), 40 CFR 93.998(d)(1)(ii)(A), 40 CFR 63.999(c)(ii))
 - b. For a bypass equipped with a seal or lock mechanism to secure the bypass in the non-diverting position: A record that monthly visual inspections of the seals or closure mechanism were done; a record of all periods when the seal mechanism is broken, the bypass valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has been broken. (40 CFR 63.983(a)(3)(ii,) 40 CFR 63.998(d)(1)(ii)(B), 40 CFR 63.999(c)(iii))

- 5. The permittee shall keep a record of each time a safety device is opened to avoid unsafe conditions in accordance with 40 CFR 63.2450(s).² (40 CFR 63.2525(f))
- 6. The permittee shall maintain the following records when a leak is detected in any closed vent system: (40 CFR 63.998(d)(1)(iii))
 - a. The instrument, equipment identification number, and the operator name, initials or identification number.
 - b. The date the leak was detected.
 - c. The date of the first attempt to repair the leak.
 - d. The date of successful repair of the leak.
 - e. The maximum instrument reading detected for concentration in parts per million by volume from the leak, measured as required by 40 CFR 63.983(c) using Method 21 of 40 CFR Part 60, Appendix A or one of the specified alternatives, after the leak is successfully repaired or determined to be non-repairable.
 - f. If the leak is not repaired within 15 days after discovery, the fact that the repair was delayed and the reason for that delay. The permittee may develop and keep a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.
- 7. For each instrumental or visual inspection to check for leaks in a closed vent system during which no leaks are detected, the permittee shall record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. (40 CFR 63.998(d)(1)(iv))
- 8. The permittee shall maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or of air pollution control equipment used to comply with 40 CFR Part 63, Subpart FFFF, during which excess emissions as defined in 40 CFR Part 63, Subpart FFFF occur. **(40 CFR 63.998(d)(4)(i))**
- 9. The permittee shall maintain records for each start-up, shutdown, and malfunction during which excess emissions occur, documenting actions taken as specified by the start-up, shutdown, and malfunction plan, and of any actions taken that are not consistent with that plan. (40 CFR 63.998(d)(4)(ii))
- 10. For each Group 2 Wastewater Stream, the permittee shall keep in a readily accessible location the following records: (40 CFR 63.147(b)(8))
 - a. Process unit identification and description of process unit
 - b. Stream identification code
 - c. Concentration of Table 8 and/or Table 9 compounds in parts per million, by weight, including documentation of the methodology used to determine concentration
 - d. Flow rate in liter per minute.
- 11. For each Group 2 Transfer Rack, the permittee shall record and maintain the following information in a readily accessible location on site: (40 CFR 63.126(c), 40 CFR 63.130(f))
 - a. The design and actual annual throughput of the loading rack, on the basis of a 12 month rolling time period
 - b. An analysis documenting the weight percent of organic HAPs in the liquid loaded
 - c. An analysis documenting the annual rack weighted average HAP partial pressure of the transfer rack
- 12. The permittee shall determine the Total Resource Effectiveness (TRE) Index Value, as specified in 40 CFR 63.115(d), for all process vents in equipment subject to 40 CFR Part 63, Subpart FFFF, except as specified in 40 CFR 63.2455(b)(1) through (3).² (40 CFR 63.2455(b))
- For any closed vent system bypass line equipped with a seal mechanism as specified in Condition IV.2, the permittee shall visually inspect the seal or closure mechanism at least once per calendar month to verify that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. (40 CFR 63.983(b)(4)(ii))
- Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2) and (3), the permittee shall conduct an initial inspection of any closed vent system using Method 21 of 40 CFR Part 60, Appendix A or one of the alternative methods also specified in 40 CFR 63.983(c)).
 (40 CFR 63.983(b)(1)(i)(A) and (ii))

- 15. Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2) and (3), the permittee shall inspect any closed vent system constructed of hard-piping once each calendar year for visible, audible, or olfactory indications of leaks. **(40 CFR 63.983(b)(1)(i)(B))**
- 16. If the inspection of a closed vent system constructed of hard piping, as required in Condition IX.5, above, reveals indications of any leak, the permittee shall either eliminate the leak or shall monitor the equipment as specified in 40 CFR 63.983(c), using either Method 21 of 40 CFR Part 60, Appendix A or one of the specified alternatives. (40 CFR 63.983(d)(1))
- 17. Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2) and (3), the permittee shall inspect any closed vent system constructed of ductwork once each calendar year as specified in 40 CFR 63.983(c), using either using Method 21 of 40 CFR Part 60, Appendix A or one of the specified alternatives. **(40 CFR 63.983(b)(1)(ii))**
- The permittee shall inspect any closed vent systems which have been determined to be unsafe-to-inspect as frequently as practical during safe-to-inspect times; provided however that inspection is not required more than once annually. 40 CFR 63.983(b)(2)(i) defines unsafe-to-inspect as equipment where inspecting personnel would be exposed to imminent or potential danger as a consequence of the inspection. (40 CFR 63.983(b)(2)(i))
- The permittee shall inspect any closed vent systems which have been determined to be difficult-to-inspect at least once every 5 years. 40 CFR 63.983(b)(3)(i) defines difficult-to-inspect as equipment which cannot be inspected without elevating the inspecting more than 2 meters (7 feet) above a support surface.
 (40 CFR 63.983(b)(3)(ii))
- 20. A leak in a closed vent system is indicated by an instrument reading greater than 500 parts per million by volume above background, or by visual inspections. Leaks shall be repaired according to the following schedule:
 - a. A first attempt at repair shall be made no later than 5 days after the leak is detected. (40 CFR 63.983(d)(2)(i)
 - Except as provided in Condition IX.10(c) below, repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later.
 (40 CFR 63.983(d)(2)(ii))
 - c. Delay of repair of the leak is allowed if repair within 15 days after a leak is detected is technically infeasible or unsafe without a closed vent system shutdown as defined in 40 CFR 63.981, or if the permittee determines that emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed as soon as is practical, but not later than the end of the next closed vent system shutdown. **(40 CFR 63.983(d)(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. Semiannual report and certification of compliance with the provisions of 40 CFR Part 63, Subpart FFFF, including all information required in 40 CFR 63.2520(e)(1) through (5), to be submitted concurrently with the semiannual reports detailed in Condition VII.2, above. (40 CFR 63.2520(b))

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5. For a performance test to demonstrate compliance with any of the provisions of 40 CFR Part 63, Subpart FFFF, the permittee shall submit a notification of intent to conduct a performance test to the AQD District Supervisor at least 60 calendar days before the performance test is scheduled to begin. The permittee shall also submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.²

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A; and for Subpart FFFF, for Miscellaneous Organic Chemical Manufacturing.² (40 CFR Part 63, Subparts A and FFFF)
- 2. Excused excursions, as defined in 40 CFR Part 63, Subpart SS, are not allowed.² (40 CFR 63.2450(m)(3))
- 3. When the term "storage vessel" is used in 40 CFR Part 63, Subpart SS, the term "storage tank" as defined in 40 CFR 63.2550 applies for the purposes of Subpart FFFF.² (40 CFR 63.2470(c)(2))
- 4. For any equipment, emission stream, or wastewater stream subject to the provisions of both 40 CFR Part 63, Subpart FFFF and another rule, the permittee may elect to comply only with the provisions as specified in 40 CFR 63.2535(a) through (I). The permittee must also identify the subject equipment, emission stream, or wastewater stream, and the provisions that will be complied with, in the notification of compliance status report required by 40 CFR 63.2520(d).² (40 CFR 63.2535)
- For any Group 2 emission point that becomes a Group 1 emission point after the compliance date for the facility, the permittee shall comply with the Group 1 requirements beginning on the date the switch occurs. (40 CFR 63.2445(d))
- 6. For each Group 2 Wastewater Stream, the permittee shall redetermine group status as necessary to determine whether the stream is Group 1 or Group 2 whenever process changes are made that could reasonably be expected to change the stream to Group 1. The permittee shall establish and maintain a Management of Change Procedure to ensure this redetermination is performed whenever required. **(40 CFR 63.132(c)(3))**
- 7. The permittee shall maintain a written plan that requires inspection of any closed vent systems designated as unsafe-to-inspect as frequently as practical during safe-to-inspect times; provided however that inspection is not required more than once annually. 40 CFR 63.983(b)(2)(i) defines unsafe-to-inspect as equipment where inspecting personnel would be exposed to imminent or potential danger as a consequence of the inspection. (40 CFR 63.983(b)(2)(ii), 40 CFR 63.998(d)(1)(i))
- 8. The permittee shall maintain a written plan that requires inspection of any closed vent systems which have been determined to be difficult-to-inspect at least once every 5 years. 40 CFR 63.983(b)(3)(i) defines difficult-to-inspect as equipment which cannot be inspected without elevating the inspecting more than 2 meters (7 feet) above a support surface. (40 CFR 63.983(b)(3)(ii), 40 CFR 63.998(d)(1)(i))

9. The permittee shall maintain a list of all parts of any closed vent system that are designated as unsafe-toinspect or difficult-to-inspect, with the reasons why they are so designated. (40 CFR 63.998(d)(1)(i))

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).

FGAPIFACILITY FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All process equipment source-wide at the American Process Incorporated Alpena Biorefinery

Emission Units: EULIME, EUPRETREAT, EUYEASTPROP, EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, EUMOLSIEVE, EUTANK1, EUTANK3, EUTANK4, and EUETHLOAD

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	7.8 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGAPIFACILITY	SC VI.5	R 336.1205(1)
2. PM	0.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGAPIFACILITY	SC VI.6	R 336.1205(1)
3. PM10	0.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGAPIFACILITY		R 336.1205(1) R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
 Total ethanol and denaturant throughput 	1.17 million gallons per year ²	12-month rolling time period as determined at the end of each calendar month	FGAPIFACILITY		R 336.1205(1) R 336.1225 R 336.1702(a) R 336.1901 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
 Denaturant throughput 	45,000 gallons per year ²	12-month rolling time period as determined at the end of each calendar month	FGAPIFACILITY		R 336.1205(1) R 336.1225 R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall submit a malfunction abatement plan (MAP) for FGAPIFACILITY to the AQD District Supervisor. The interim MAP and any future revised MAP shall be subject to review and approval, as provided in Rule 911. The permittee shall not operate any equipment in FGAPIFACILITY unless the MAP, revised as necessary according to the procedures of Rule 911, is implemented and maintained. The MAP shall include procedures for maintaining and operating equipment in a satisfactory manner, including procedures for minimizing emissions during malfunction events, and a program for corrective action for such events. If the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the MAP within 45 days after such an event occurs.² (R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))
- 2. The permittee shall submit an odor management plan (OMP) for FGAPIFACILITY to the AQD District Supervisor. The OMP shall include procedures for maintaining and operating equipment in a manner that minimizes the release of odors to the outside air, and a program for corrective action for such events. If the OMP fails to address or inadequately addresses an event that results in an odor release to the outside air at the time the plan is initially developed, the owner or operator shall revise the OMP within 45 days after such an event occurs.² (R 336.1901)

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 permittee shall observe the lime silo vent at least once during each filling operation. Upon observing visible emissions other than water vapor, the permittee shall immediately take corrective actions as specified in the facility Malfunction Abatement Plan. (R 336.1910, R 336.1213(3))
- The permittee shall determine the VOC emission rate from the wet scrubber exhaust and any other process vents using a properly calibrated handheld meter or other method approved by the AQD District Supervisor. (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))

- All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(1), R 336.1225, R 336.1702(a), R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))
- 2. The permittee shall calculate monthly VOC emissions from process vents and transfer operations using emission factors acceptable to the AQD. (R 336.1213(3))
- The permittee shall calculate and keep, in a satisfactory manner, monthly and 12-month rolling time period records of the emissions of VOC and PM from FGAPIFACILITY. The permittee shall keep all records on file and make them available to the AQD upon request. ² (R 336.1205(1), R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
- 4. The permittee shall calculate and keep, in a satisfactory manner, monthly and 12-month rolling time period of the emissions of PM10 from FGAPIFACILITY. The permittee shall keep all records on file and make them available to the AQD upon request.² (R 336.1205(1), R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))

5. The permittee shall keep, in a satisfactory manner, records of the amount of denaturant and of ethanol combined with denaturant shipped from the facility for each month and 12 month rolling time period, as determined at the end of each calendar month. The permittee shall keep all records on file and make them available to the AQD upon request² (R 336.1205(1), R 336.1225, R 336.1702(a))

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))

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This 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).

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 1.2 Acronyms and Abbreviations

	Common Acronyms	Pollutant / Measurement Abbreviations		
AQD	Air Quality Division	acfm	Actual cubic feet per minute	
BACT	Best Available Control Technology	BTU	British Thermal Unit	
CAA	Clean Air Act	°C	Degrees Celsius	
CAM	Compliance Assurance Monitoring	СО	Carbon Monoxide	
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent	
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot	
СОМ	Continuous Opacity Monitoring	dscm	Dry standard cubic meter	
Department/	Michigan Department of Environmental	°F	Degrees Fahrenheit	
department	Quality	gr	Grains	
EU	Emission Unit	HAP	Hazardous Air Pollutant	
FG	Flexible Group	Hg	Mercury	
GACS	Gallons of Applied Coating Solids	hr	Hour	
GC	General Condition	HP	Horsepower	
GHGs	Greenhouse Gases	H₂S	Hydrogen Sulfide	
HVLP	High Volume Low Pressure*	kW	Kilowatt	
ID	Identification	lb	Pound	
IRSL	Initial Risk Screening Level	m	Meter	
ITSL	Initial Threshold Screening Level	mg	Milligram	
LAER	Lowest Achievable Emission Rate	mm	Millimeter	
MACT	Maximum Achievable Control Technology	MM	Million	
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts	
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds	
MDEQ	Michigan Department of Environmental Quality	NO _x ng	Oxides of Nitrogen Nanogram	
MSDS	Material Safety Data Sheet	PM	Particulate Matter	
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10	
NAAQS	National Ambient Air Quality Standards		microns in diameter	
NESHAP	National Emission Standard for Hazardous	PM2.5	Particulate Matter equal to or less than 2.5	
NODO	Air Pollutants	nnh	microns in diameter	
NSPS	New Source Performance Standards	pph	Pounds per hour	
NSR	New Source Review	ppm	Parts per million	
PS	Performance Specification	ppmv	Parts per million by volume	
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight	
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute	
PTI	Permit to Install	psig	Pounds per square inch gauge	
RACT ROP	Reasonable Available Control Technology Renewable Operating Permit	scf sec	Standard cubic feet Seconds	
SC	Special Condition	SO ₂	Sulfur Dioxide	
SCR	Selective Catalytic Reduction		Toxic Air Contaminant	
SNCR	Selective Catalytic Reduction	Temp	Temperature	
SRN	State Registration Number	THC	Total Hydrocarbons	
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year	
USEPA/EPA	United States Environmental Protection	μg	Microgram	
	Agency	μm	Micrometer or Micron	
VE	Visible Emissions	VOC	Volatile Organic Compounds	
		yr	Year	

Appendix 2-2. 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 3-2. 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 4-2. 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 5-2. 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 6-2. Permits to Install

The following table lists any Permit to Install and/or Operate, that relate to the identified emission units or flexible groups as of the effective date of this ROP. This includes all Permits to Install and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-B1476-2015. PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
73-10B	API Alpena Biorefinery	EULIME EUTANK3 EUETHLOAD FGETHANOL FGNSPSVVa FGMON FGAPIFACILITY

Appendix 7-2. 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 8-2. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, 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.