

Michigan Department of Environmental Quality
Air Quality Division

EFFECTIVE DATE: June 29, 2011

ISSUED TO

Day International, Inc.

State Registration Number (SRN): B2014

LOCATED AT

111 Day Drive, Three Rivers, Michigan 49093

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2014-2011

Expiration Date: June 29, 2016

Administratively Complete ROP Renewal Application Due Between December 29, 2014 and
December 29, 2015

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-B2014-2011

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

Mary A. Douglas, Kalamazoo 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 will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or is state only enforceable will be noted as such.

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

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

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source- wide PTI No. MI-PTI-B2014- pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. 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))**
2. 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). **(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. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "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 Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303: **(R 336.1301(1) in pertinent part)**
 - a. A 6-minute average of 20 percent 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.
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). **(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(4))**

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. **(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(9))**
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(7))**

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 reclaiming, 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, Part 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, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - 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, or has been interrupted for 18 months, the applicable terms and conditions from that PTI 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.

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	175.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	VI. 2	R 336.1205(3)

II. MATERIAL LIMIT(S): NA

III. PROCESS/OPERATIONAL RESTRICTION(S): NA

IV. DESIGN/EQUIPMENT PARAMETER(S): NA

V. TESTING/SAMPLING

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

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

VI. MONITORING/RECORDKEEPING

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

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

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205(3))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S): NA

IX. OTHER REQUIREMENT(S): NA

Footnotes:

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

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

C. EMISSION UNIT 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
EUCLEANING	Process of using solvents to clean the blades on the spreaders - one blade per spreader (4). Also includes cleaning operations in the mixing room, which includes a cold cleaner using alcohol. Process is contained within the permanent total enclosure (PTE) and controlled by the carbon adsorption system.	01-01-1983/ 01-01-1994	FG-PTECONTROL FGMACT_0000
EUCOATING	The process of spreading cement over fabric to produce lithographic printing blankets. Consists of four spreaders and one extruder. Process is contained within the PTE and controlled by the carbon adsorption system.	01-01-1983/ 01-01-1994	FG-PTECONTROL FGMACT_0000
EUGWAIRSTRIPPERS	Two groundwater air strippers that are used for on-site remediation. Controlled by two packed bed wet scrubbers.	08-01-1988/ 03-01-1989	NA
EUCOMPOUNDING	The weighing and handling of the raw materials used to produce the rubber compound. Consists of one compounding area controlled by a pulse jet baghouse.	06-01-1983/ NA	FGFABFILTER1
EUMILLING	Three mills that combine and mix the raw materials from EUCOMPOUNDING to form the rubber compound. Controlled by a pulse jet baghouse.	06-01-1983/ NA	FGFABFILTER1
EUINKJET2	Set of four Linx 4800 inkjet printers from Matthews Printing. The printers are used to print identification on the back of product.	01-01-2001/ NA	FGRULE290
EUROSS200	Two Ross 200-gallon cement mixers. The process is contained within the PTE and controlled by the carbon adsorption system.	11-01-2001/ NA	FG-PTECONTROL FGMACT_0000
EUWINKWORTH	One Winkworth 200-gallon horizontal cement mixer. The process is contained within the PTE and controlled by the carbon adsorption system.	09-01-2001/ NA	FG-PTECONTROL FGMACT_0000

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCEMENTPREP	Sixteen Ross 100-gallon mixers and one Ross 300-gallon mixer, in which the cement compound is prepared. This process is contained within the PTE and is controlled by the carbon adsorption system.	01-01-1983/ 10-01-1994	FG-PTECONTROL FGMACT_OOOO
EUCURING	Five steam heated curing ovens and a festooning room. All are within the PTE and are controlled by the carbon adsorption system.	01-01-1983/ 08-09-2004	FG-PTECONTROL FGMACT_OOOO
EUUST	One 15,000-gallon (13,000-gallon capacity, 2,000-gallon overflow protection) underground storage tank used to store toluene.	06-01-1987/ NA	FGMACT_OOOO
EU-SVE	Soil vapor extraction (SVE) system installed to remediate a toluene leak. The SVE is controlled by the carbon adsorption system and is subject to MACT Subpart GGGGG.	04-15-2008	FGRULE290 FGMACT_G5
EUCOLDCLEANER	Heptane and ethanol cold cleaners and any other cold cleaner added at the facility. The ethanol cleaner is also included in EUCLEANING.	12-1997 5-2001	FGCOLDCLEANER
EURULE287k	Pony mixers exempt from a PTI per Rule 287(k), but subject to MACT OOOO. They are located in the PTE and are controlled by the carbon adsorption system.	6-15-2010	FGMACT_OOOO

**EUGWAIRSTRIPPERS
 EMISSION UNIT CONDITIONS**

DESCRIPTION: Two groundwater air strippers that are used in an on-site remediation operation.

Flexible Group ID:

POLLUTION CONTROL EQUIPMENT: Two packed bed wet scrubbers

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC - Air Stripper No. 1	0.11 lb/hr ²	Averaged over the operating hours of the calendar month	EUGWAIRSTRIPPE RS	VI.2.	R 336.1702(a)
2. VOC – Air Stripper No. 2	0.01 lb/hr ²	Averaged over the operating hours of the calendar month	EUGWAIRSTRIPPE RS	VI.2.	R 336.1702(a)

II. MATERIAL LIMIT(S): NA

III. PROCESS/OPERATIONAL RESTRICTION(S): NA

IV. DESIGN/EQUIPMENT PARAMETER(S): NA

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. Monthly records of the following:
 - a. Flow rate of influent water streams for both air strippers.² (R 336.1201(3))
 - b. Flow rate of effluent water streams for both air strippers.² (R 336.1201(3))
 - c. VOC concentration of influent water streams of both air strippers.² (R 336.1201(3))
 - d. VOC concentration of effluent water streams of both air strippers.² (R 336.1201(3))
 - e. Static pressure readings of both air strippers. (R 336.1213(3))
 - f. Outfall water observation. (R 336.1213(3))
 - g. Hours of operation. (R 336.1213(3))
2. VOC emission rate calculations for both air strippers on a monthly basis (See Appendix 7).² (R 336.1201(3))

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. 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 reports of the following information:² **(R 336.1201(3))**
 - a. Flow rates of influent and effluent water streams of both air strippers on a monthly basis.
 - b. VOC concentrations of influent water streams of both air strippers on a monthly basis.
 - c. VOC concentrations of effluent water streams of both air strippers on a monthly basis.
 - d. Monthly VOC emission rate for each air stripper.

This report is due by September 15 for the reporting period beginning January 1 and ending June 30 and due by March 15 for the reporting period beginning July 1 and ending December 31.

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVAIRSTRIPPERST1	52 ²	34 ²	R 336.1201(3)
2. SVAIRSTRIPPERST2	52 ²	34 ²	R 336.1201(3)

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).

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
FG-PTECONTROL	Permitted emission units within the PTE and controlled by the carbon adsorber. The carbon adsorber is equipped with a VOC continuous emission monitoring systems (CEMS) located at the outlet of the carbon adsorber.	EUCLEANING, EUCOATING, EUROSS200, EUCURING EUWINKWORTH, EUCEMENTPREP
FGMACT_OOOO	Equipment subject to 40 CFR, Part 63, Subpart OOOO, and using the emission rate with add-on control compliance option.	EUCLEANING, EUJUST, EUCOATING, EUWINKWORTH, EUCEMENTPREP, EUROSS200, EUCURING EURULE287k
FGFABFILTER1	Process of weighing, handling, combining, and mixing raw materials that are used in producing a rubber compound. Consists of one compounding area and three mills controlled by a common baghouse.	EUCOMPOUNDING, EUMILLING
FGRULE290	Any existing or future emission unit that emits air contaminants that are exempt from the requirements of R 336.1201 pursuant to R 336.1290.	Including, but not limited to: EUINKJET2, EU-SVE
FGMACT_G5	Equipment subject to 40 CFR, Part 63, Subpart GGGGG.	EU-SVE
FGCCOLDCLEANER	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	Including, but not limited to: EUColdCleaner

**FG-PTECONTROL
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION: Mixing of cement compound, spreading the cement over fabric to produce printing blankets, and curing the blanket. Also includes the cleaning of the process equipment. Consists of mixers, four spreaders, one extruder, one festooning room, and five steam heated curing ovens.

Emission Units: EUCLEANING, EUCOATING, EUROSS200, EUWINKWORTH, EUCEMENTPREP, EUCURING

POLLUTION CONTROL EQUIPMENT: PTE and solvent recovery system (SRS) - carbon adsorption

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.VOC	175.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	FG-PTECONTROL	VI.5	R 336.1205, R 336.1225, R 336.1702(a)
2. VOC as measured from the outlet of the carbon adsorption system	128 ppm by volume on a wet gas basis, as propane* ²	Based upon a 1-hour average	FG-PTECONTROL	VI.2	R 336.1205, R 336.1225, R 336.1702(a)
3. VOC as measured from the outlet of the carbon adsorption system	43.7 pph (as propane) ²	Test Protocol	FG-PTECONTROL	GC 13	R 336.1205, R 336.1225, R 336.1702(a)

*128 ppmv on a wet gas basis as propane is equivalent to 55 ppmv on a wet gas basis as toluene.

II. MATERIAL LIMIT(S): NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall maintain a minimum of 0.007 inches of water pressure differential between the PTE associated with FG-PTECONTROL and the adjacent area on a continuous basis.² **(R 336.1225, R 336.1299(2)(b), R 336.1702(a))**
2. The permittee shall not operate any process and/or emission unit within FG-PTECONTROL unless the permanent total enclosure (PTE) is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the PTE is operating at a pressure lower than all adjacent areas so that air flows into the PTE through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed.² **(R 336.1205, R 336.1225, R 336.1702(a))**
3. The permittee shall not operate any emission unit within FG-PTECONTROL unless the carbon adsorption system is installed, maintained, and operated in a satisfactory manner.² **(R 336.1205, R 336.1225, R 336.1702(a))**

4. The permittee shall not operate FG-PTECONTROL unless the timer control system and the VOC CEMS located at the outlet of the carbon adsorber(s) is installed, maintained, and operated in a satisfactory manner.² **(R 336.1225, R 336.1702(a))**
5. The adsorption/regeneration cycle of FG-PTECONTROL shall be controlled by at least one of the following:
 - a. The continuous emission monitoring system, which monitors the VOC in the exhaust gases from the outlet of each carbon bed on-line. The CEM system shall initiate regeneration based on the amount of VOC present in the exhaust gases of the carbon bed(s) on-line.² **(R 336.1702(a))**
 - b. The timer control system which shall initiate regeneration based on estimated breakthrough of the carbon bed(s) on-line.² **(R 336.1702(a))**
6. The permittee shall perform routine maintenance and preventative maintenance procedures on FG-PTECONTROL as recommended by the manufacturer.² **(R 336.1702(a))**
7. The permittee shall not operate FG-PTECONTROL unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 90 days of permit issuance, and is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**
8. The permittee shall restore operations of FG-PTECONTROL, including the VOC continuous emission monitoring system and timer control system, to routine operating conditions as quickly as possible in response to an exceedance, excursion, or malfunction.² **(R 336.1702(a))**
9. The adsorption time of the on-line carbon bed shall be greater than or equal to the regeneration time (i.e. regeneration, drying and cooling) of the off-line bed(s). Off-line bed(s) shall be ready for use (i.e. desorbed and cooled) before breakthrough of the on-line bed occurs.² **(R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the VOC emissions from FG-PTECONTROL on a continuous basis. The VOC emissions shall be recorded in units of parts per million as propane. The CEMS shall be equipped with an alarm system that is activated when breakthrough is reached on an on-line bed.² **(R 336.1205, R 336.1225, R 336.1702(a))**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to continuously monitor and record the pressure differential between the permanent total enclosure (PTE) for FG-PTECONTROL and the outside area, to verify that air is entering the PTE.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall install covers on each cleaning solvent container associated with EU-CLEANING portion of FG-PTECONTROL. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1702(a))**
4. The permittee shall not operate the EU-CEMENTPREP portion of FG-PTECONTROL unless the vapor balance, water cooling system and lids are installed and operating properly.² **(R 336.1702(a))**

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 determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. The permittee shall test SV-PTECONTROL for VOC within 12 months of issuance of this permit. **(R 336.1213(3))**
3. A complete stack testing protocol shall be submitted to and approved by the AQD no less than 30 days prior to testing. **(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 develop a periodic monitoring plan for the carbon adsorption system consisting of appropriate monitoring data determined during the initial compliance testing. The permittee must submit the plan to the AQD for approval within 90 days of completion of the testing.² **(R 336.1205, R 336.1225, R 336.1299(2)(b), R 336.1702(a))**
2. The permittee shall monitor and record the VOC emissions from FG-PTECONTROL on a continuous basis in a manner and with instrumentation approved, in writing, by the Air Quality Division. The CEMS shall be installed, calibrated, maintained and operated in accordance with the procedures set forth in Performance Specification 8 (PS8), Appendix B of 40 CFR Part 60. The permittee shall use all reasonable measures necessary to operate the CEMS system during periods of startup, shutdown, and malfunction. The VOC CEMS required by this condition shall meet the following conditions as identified below and in Appendix 3:² **(R 336.1225, R 336.1702(a))**
 - a. The monitor shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in Appendix B PS 8, 40 CFR Part 60.
 - b. Each calendar quarter, the permittee shall perform and report the Quality Assurance Procedures set forth in Appendix F of 40 CFR Part 60. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD
 - c. The permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to the Air Quality Division, within 30 days following the end of each calendar quarter. The summary report shall follow the format of Figure 1 in 40 CFR 60.7(d). Each EER shall include the following information:
 - i. A report of each event during which emissions of VOC exceeded the associated limit as specified in conditions of this permit. The report shall include the date, beginning and ending time, magnitude, cause, and corrective actions of each such event during the reporting period.
 - ii. A report of all periods during which the CEMS was down, the cause, and corrective action taken.
 - iii. A report of the total source operating time during the reporting period.
 - iv. If emissions never exceeded an emission limit or there was no downtime during the reporting period, the permittee shall report that fact.
3. The permittee shall monitor and record, in a satisfactory manner, the pressure differential between the permanent total enclosure (PTE) for FG-PTECONTROL and the outside area, on a continuous basis, to verify that air is entering the PTE. The permittee shall keep these records of the water pressure differential between the PTE and the adjacent area on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1299(2)(b), R 336.1702(a))**
4. The permittee shall prepare and submit an air pressure differential monitoring plan for the permanent total enclosure (PTE) associated with FG-PTECONTROL, and the outside area, to the AQD District Supervisor. The

monitoring plan shall include a quality assurance plan stating the method proposed to calibrate/audit the monitor in order to verify that the monitoring equipment has been installed and is operating properly.² **(R 336.1205, R 336.1225, R 336.1299(2)(b), R 336.1702(a))**

5. The permittee shall keep the following information on a monthly basis for FG-PTECONTROL:
 - a. Gallons or pounds of each VOC containing material used within any emission unit of FG-PTECONTROL (i.e. coating, reducer, solvent(s), etc.).
 - b. Where applicable, amount of material recovered, reused, and/or disposed of.
 - c. VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used within any emission unit of FG-PTECONTROL.
 - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**

6. The permittee shall submit the monitoring plans required in SC VI.1, SC VI.2, and SC VI.4 within 60 days of permit issuance. If at any time any one of the monitoring plans is found to be inadequate, the permittee shall amend the appropriate plan within 45 days after notification from the AQD that the plan(s) must be amended. The permittee shall also amend the plan(s) within 45 days upon request from the District Supervisor. The permittee shall submit the plan(s) and any amendments to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the plan(s) or amended plan(s) shall be considered approved.² **(R 336.1205, R 336.1225, R 336.1299(2)(b), R 336.1702(a))**

See Appendix 3

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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. SV-PTECONTROL	56 ²	30 ²	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

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).

**FGMACT_0000
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION: Processes subject to 40 CFR, Part 63, Subpart OOOO, and using the emission rate with add-on control compliance option.

Emission Unit: EUCLEANING, EUCOATING, EUROSS200, EUWINKWORTH, EUCEMENTPREP, EUCURING, EUUST, EURULE287k

POLLUTION CONTROL EQUIPMENT: PTE and SRS (carbon adsorption)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.12 kgs per kg of coating solids applied ²	12-month rolling time period *	FGMACT_0000	VI(3)	40 CFR 63.4290
2. Organic HAP	97% overall control efficiency ²	12-month rolling time period *	FGMACT_0000	VI(3)	40 CFR 63.4290

The permittee shall comply with one of the options listed above
 * As determined at the end of each calendar month.

3. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in I.1 or I.2 using the emission rate with add-on controls option which is listed in 40 CFR 63.4291(a)(3).² **(40 CFR 63.4291(a)(3))**
4. When determining compliance with the emission limit in I.1 or I.2, the permittee shall include all organic HAP containing coatings, thinners, and/or other additives, and cleaning materials as defined in 40 CFR 63.4371 used in the coating operation.² **(40 CFR 63.4291)**

II. MATERIAL LIMIT(S): NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Except those web coating operations for which you conduct a liquid to liquid material balance according to 40 CFR 63.4341(e)(5), the permittee shall meet the operating limits specified in Table 2 of 40 CFR part 63 Subpart OOOO as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.4363. The permittee must meet the operating limits at all times after having been established.² **(40 CFR 63.4291(a)(3), 40 CFR 63.4292(b) and Table 2)**
 - a. Submit a monitoring plan for the emission capture system to the Administrator that identifies the operating parameters to be monitored according to 40 CFR 63.4364(e). The permittee shall conduct monitoring according to the plan. **(40 CFR 63.4364(e), & Table 2)**
2. The permittee shall develop and implement a work practice plan, to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The work practice plan shall specify practices and procedures to ensure at a minimum the following elements are implemented: **(40 CFR 63.4291(a)(3))**
 - a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.² **(40 CFR 63.4293(b)(1))**

- b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.² **(40 CFR 63.4293(b)(2))**
- c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.² **(40 CFR 63.4293(b)(3))**
- d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.² **(40 CFR 63.4293(b)(4))**
- e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.² **(40 CFR 63.4293(b)(5))**

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g).² **(40 CFR 63.4293(c))**

- 3. FGMACT_OOOO shall be in compliance with the applicable emission limits or comply with the startup, shutdown, malfunction (SSM) plan at all times. Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations that occur during a period of SSM are not violations if you demonstrate to the Administrator's satisfaction that you were operating in accordance with the SSM plan.² **(40 CFR 63.4300(a)(3)(i), 40 CFR 63.4342(h))**
- 4. FGMACT_OOOO shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.4292 for all averaging periods except for solvent recovery systems for which you conduct liquid to liquid material balances according to 40 CFR 63.4341(e)(5) or (f)(5).² **(40 CFR 63.4300(a)(3)(ii), 40 CFR 63.4342(c))**
- 5. FGMACT_OOOO shall be in compliance with the work practice standards in 40 CFR 63.4293 at all times.² **(40 CFR 63.4300(a)(3)(iii), 40 CFR 63.4342(e))**
- 6. The permittee shall always operate and maintain the coating operation(s), including the control device and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i).² **(40 CFR 63.4300(b))**
- 7. The permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions.² **(40 CFR 63.4300(c))**

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 determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating and the density of each material used in accordance with 40 CFR 63.4331 and 40 CFR 63.4341.² **(40 CFR 63.4331, 40 CFR 63.4341)**
- 2. The permittee shall conduct each performance test required by 40 CFR 63.4340 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.4360(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h).² **(40 CFR 63.4360(a))**
- 3. The permittee shall conduct each performance test of an emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirement in 40 CFR 63.4361 and 40 CFR 63.4362.² **(40 CFR 63.4360(b))**

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 all records required by 40 CFR 63.4312 in the format and timeframes outlined in 40 CFR 63.4313.² **(40 CFR 63.4342(j))**
2. The permittee shall maintain, at a minimum, the following records for each compliance period as applicable to the compliance approach chosen:² **(40 CFR 63.4312)**
 - a. A copy of each notification and report that is submitted to comply with Subpart OOOO, and the documentation supporting each notification and report.² **(40 CFR 63.4312(a))**
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP for coating, thinning and cleaning materials; and the mass fraction of solids for coating materials. If testing was conducted to determine the mass fraction of organic HAP of coating materials or the mass fraction of solids of coating materials, a copy of the complete test report must be kept. If information provided to you by the manufacturer or supplier of the material that was based on testing, a summary sheet of results provided by the manufacturer or supplier must be kept. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.² **(40 CFR 63.4312(b))**
 - c. All required calculations for the compliance option(s) used. This shall include the calculation of the total mass of organic HAP emissions before add-on controls for the coating, thinning and cleaning materials applied each month using Equations 1, 1A and 1B of 40 CFR 43.4331, and, if applicable, the calculation used to determine the mass of organic HAP in waste materials according to 40 CFR 63.4331(a)(4)(iii); the calculation of the total mass of the solids contained in all coating materials applied during the month using Equation 2 of 40 CFR 63.4331; the calculation of the mass of organic HAP emission reduction by emission capture systems and add-on control devices using Equations 1,1A, 1B, 1C, 2, 3, 3A & 3B of 40 CFR 63.4341, as applicable; and the calculation of the organic HAP emission rate for each compliance period using Equation 4 of 40 CFR 63.4341.² **(40 CFR 63.4312(c)(1))**
 - d. The name, mass, and mass fraction of each coating, thinner, and/or other additive, and cleaning material used during each compliance period.² **(40 CFR 63.4312(d) & (e))**
 - e. The mass fraction of solids for each coating applied during each compliance period.² **40 CFR 63.4312(f)**
 - f. The information specified below, if an allowance is used in Equation 1 of CFR 40 63.4331 for organic HAP contained in waste materials sent to, or designated for shipment to, a treatment, storage, and disposal facility (TSDF) according to §63.4331(a)(4)(iii).² **(40 CFR 63.4312(g))**
 - i. The name and address of each TSDF to which you sent waste materials for which you used an allowance in Equation 1 or 4 of CFR 40 63.4331, a statement of which subparts under 40 CFR parts 262,264, 265 and 266 apply to the facility, and the date of each shipment.
 - ii. Identification of the operations producing waste materials included in each shipment and the compliance periods(s) in which you used the allowance for these materials in Equation 1, respectively, of 40 CFR 63.4331.
 - iii. The methodology used in accordance with §63.4331(a)(4)(iii) to determine the total amount of waste materials sent to or the amount collected, stored and designated for transport to a TSDF each compliance period; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
 - g. The date, time, and duration of each deviation.² **(40 CFR 63.4312(i))**
 - h. The applicable records specified in 40 CFR 63.4312(j)(1) through (8).² **(40 CFR 63.4312(j))**
 - i. For each deviation a record of whether the deviation occurred during a period of SSM.
 - ii. The records in 40 CFR 63.6(e)(3)(iii)-(v) related to SSM.
 - iii. For each capture system that is a PeTE, the data and documentation used to support a determination that the capture system meets the criteria in Method 204 of appendix M to 40 CFR 51 for a PeTE and has a capture efficiency of 100%, as specified in 40 CFR 63.4361(a).
 - iv. A record of the work practice plan required by 40 CFR 63.4293 and documentation that you are implementing the plan on a continuous basis.

3. The permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4290, each month, according to the procedures in 40 CFR 63.4341.² **(40 CFR 63.4342(a))**
4. During the performance test required by 40 CFR 63.4340, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.4363 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.4292.² **(40 CFR 63.4363)**
5. The permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements below:² **(40 CFR 63.4364(a))**
 - a. Each CPMS must complete a minimum of 1 cycle of operation for each successive 15 minute period. The permittee must have a minimum of 4 equally spaced successive cycles of CPMS operation to have a valid hour of data.
 - b. The permittee must have valid data from at least 90% of the hours during which the process operated.
 - c. The permittee must determine the hourly average of all recorded readings according to:
 - i. The permittee must have at least 3 of 4 equally data values from that hour from a CMS that is not out-of-control.
 - ii. Provided all of the readings recorded in accordance with this requirement clearly demonstrate continuous compliance with the standard, then the hourly average of all recorded readings are not required to be determined.
 - d. The permittee must determine the rolling 3 hour average of all recorded readings for each operating period. To do this there must be at least 2 of 3 of the hourly averages for that period using only average values that are based on valid data (i.e. not from out-of-control periods).
 - e. The permittee must record the results of each inspection, calibration, and validation check of the CPMS.
 - f. At all times, the monitoring system must be maintained in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - g. Except for monitoring malfunctions, associated repairs, or required QA or QC activities (including calibration checks or required zero and span adjustments), you must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required QA or QC activities shall not be used for the purposes of calculating the emissions concentration and percent reductions specified in table 1 of Subpart OOOO. All the valid data collected during all other periods in assessing compliance of the control device and associated control system must be used. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
 - h. Any averaging period for which there is not valid monitoring data and such data is required constitutes a deviation, and the Administrator must be notified in accordance with 40 CFR 63.4311(a).
6. The permittee must submit to EPA for approval a monitoring plan that identifies operating parameters to be monitored according to 40 CFR 63.4364(e) and then conduct monitoring according to the plan. The permittee shall demonstrate continuous compliance with each operating limit in the plan.² **(40 CFR 63.4292(c), 40 CFR 63.4364(d))**
7. If an operating parameter deviates from the established limit, the permittee shall assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation and treat the emissions as if they were uncontrolled, as indicated in Equation 1 of 40 CFR 63.4341.² **(40 CFR 63.4342(c)(2))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. 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 report the following as deviations as specified in 40 CFR 63.4311(a)(7):
 - a. The organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in Table 1 of 40 CFR 63.4290.² **(40 CFR 63.4342(b))**
 - b. An operating parameter is out of the allowed range;² **(40 CFR 63.4342(c)(1))**
 - c. Any control system by-pass line for which liquid-liquid material balances are not carried out, is opened;² **(40 CFR 63.4342(d))**
 - d. Deviations from work practice standards occur.² **(40 CFR 63.4342(e))**
5. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h) as they apply to the source and according to the dates specified in those sections.² **(40 CFR 63.4310)**
6. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4311 at the same time as the reports specified in condition VII.2. If there were no deviations of the applicable emission limits, operating limits and work practice standards in 63.4293, include a statement that there were no deviations from the emission limitations during the reporting period. If a continuous parameter monitoring system (CPMS) is required and there were no periods during which the CPMS was out-of-control as specified in 40 CFR 63.8(c)(7) the semi-annual compliance report shall include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.² **(40 CFR 63.4311(a), (40 CFR 63.4342(f))**
7. The permittee shall submit all performance test reports for emission capture systems and add-on control devices not later than 60 days after completing the tests as specified in 40 CFR 63.10(d)(2).² **(40 CFR 63.4311(b), 40 CFR 63.10(d))**
8. If a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified in 40 CFR 63.4311(c).² **(40 CFR 63.4311(c), 40 CFR 63.10(d))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S): 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 Subpart OOOO for Printing, Coating, And Dyeing of Fabrics and Other Textiles by the initial compliance date.² **(40 CFR Part 63, Subparts A and OOOO)**
2. Compliance with 40 CFR, Part 63, Subparts A & OOOO shall be considered compliance with 40 CFR, Part 60, Subparts A & VVV. **(40 CFR, Part 60, Subpart VVV)**

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).

FGMACT_G5
FLEXIBLE GROUP CONDITIONS

DESCRIPTION: Site remediations that meet the conditions of 40 CFR 63.7881(a) and choose to comply with 40 CFR 63.7884(a) by complying with 40 CFR, Part 63, Subpart OOOO.

Emission Unit: EU-SVE

POLLUTION CONTROL EQUIPMENT: SRS (carbon adsorption)

I. EMISSION LIMIT(S)

1. The permittee shall control emissions of toluene in compliance with the standards specified in 40 CFR part 63 subpart OOOO. The permittee shall comply with all applicable emission limits and work practice standards under subpart OOOO. This provision does not apply to any exemption of the affected source from the emission limits and work practice standards allowed by subpart OOOO. **(40 CFR 63.7884(a), 40 CFR 63.7885(b)(3), 40 CFR 63.7886(b)(3))**

II. MATERIAL LIMIT(S): NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall control HAP emissions from equipment leaks from each equipment component that is part of the affected source by implementing leak detection and control measures according to the standards specified in 40 CFR 63.7920 through 63.7922. **(40 CFR 60.7887(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S): NA

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. The permittee shall demonstrate initial compliance with the applicable general standards for equipment leaks in 40 CFR 63.7887 by meeting the requirements in 40 CFR 63.7921. **(40 CFR 63.7937(d))**
2. The permittee shall demonstrate continuous compliance with the applicable general standards for equipment leaks in 40 CFR 63.7887 by meeting the requirements in 40 CFR 63.7922. **(40 CFR 63.7938(d))**
3. If after the remediation activity is completed, there are no other remediation activities at the facility, and you are no longer the owner of the facility, you may keep all records for the completed remediation activity at an off-site location provided you notify the Administrator in writing of the name, address and contact person for the off-site location. **(40 CFR 63.7952(d))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. 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 all semiannual compliance reports specified in 40 CFR 63.7951(a) at the same time as the report specified in condition VII.2. Each report shall must include the information specified in 40 CFR 63.7951(b) as applicable. **(40 CFR 63.7951(a)&(b))**
5. If a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified in 40 CFR 63.7951(c). **(40 CFR 63.7951(c), 40 CFR 63.10(d))**
6. The permittee shall report each instance that an applicable emission limit, operating limit, and/or work practice standard was not met, including periods of SSM. These instances are deviations and must be reported according to the requirements in 40 CFR 63.7951. **(40 CFR 63.7935(e))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S): 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 Subparts A and GGGGG upon initial startup. **(40 CFR Part 63 Subparts A & GGGGG)**

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).

**FGFABFILTER1
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION: Process of weighing, handling, combining, and mixing raw materials that are used in producing a rubber compound. Consists of one compounding area and three mills all controlled by the same baghouse.

Emission Unit: EU-COMPOUNDING, EU-MILLING

POLLUTION CONTROL EQUIPMENT: Pulse Jet Baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.01 lb/1,000 lb exhaust gases, calculated on a dry gas basis ²	Instantaneous	FGFABFILTER1	VI.1 VI.2	R 336.1331(1)

II. MATERIAL LIMIT(S): NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall not operate FGFABFILTER1 unless the baghouse dust collector including continuous differential pressure gauge is installed and operating properly.² (R 336.1910)
2. Permittee shall perform routine maintenance on the baghouse dust collector as noted in Appendix 9. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S): NA

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. Permittee shall perform and record the results of a weekly 6-minute visible emission observation on the baghouse during peak operating conditions (See Condition IX.). (R 336.1213(3))
2. Permittee shall record differential pressure readings from the baghouse once per day during peak operating conditions (See Condition IX.). (R 336.1213(3))

VII. REPORTING

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S): NA

IX. OTHER REQUIREMENT(S)

1. The Malfunction Abatement Program for the baghouse dust collector, included as Appendix 9, shall be implemented when the continuous differential pressure gauge reading is not between 0.7 and 5.0 inches of water or when visible emissions are observed. **(R 336.1213(3))**

Footnotes:

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

FGRULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION: Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

Emission Unit: Including, but not limited to: EUINKJET2, EU-SVE

POLLUTION CONTROL EQUIPMENT: EU-SVE - SRS (carbon adsorption)

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**
2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**
3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**
 - b. The visible emissions from the emission unit are not more than 5 percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**
 - c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

II. MATERIAL LIMIT(S): NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**

IV. DESIGN/EQUIPMENT PARAMETER(S): NA

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. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor: **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
 - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**
2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information: **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S): NA

IX. OTHER REQUIREMENT(S): NA

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION: Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 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: Including, but not limited to, EUCOLDCLEANER

I. EMISSION LIMIT(S): NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(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. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S): NA

IX. OTHER REQUIREMENT(S): NA

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: Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

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

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-PTECONTROL.

CEMS Requirements:

1. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 8 of Appendix B to 40 CFR Part 60.
2. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Appendix F of 40 CFR Part 60. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F).
3. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to the AQD, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:
 - a. A report of each exceedance above the limits specified in conditions of this permit. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of CEMS downtime and corrective action.
 - c. A report of the total operating time of the FG-PTECONTROL during the reporting period.
 - d. A report of any periods that the CEMS exceeds the instrument range.
 - e. If no exceedances or CEMS downtime occurred during the reporting period, the permittee shall report that fact.

The permittee shall keep all monitoring data on file for a period of at least five years and make them available to the AQD upon request.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. MI-ROP-B2014-2005. This includes any PTI that were incorporated into the Source-wide PTI No MI-PTI-B2014-2005 through amendments or modifications and any PTI that remained off-permit until this ROP renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
25-08	Permit includes all equipment in the facility's permanent total enclosure and controlled by the solvent recovery system installed to comply with the MACT. This permit reflects current operation of this equipment.	FG-PTECONTROL, FGMACT_OOOO FGFACILITY
25-08A	Permit includes all equipment in the facility's permanent total enclosure and controlled by the solvent recovery system installed to comply with the MACT. This permit reflects current operation of this equipment.	FG-PTECONTROL, FGMACT_OOOO FGFACILITY
MI-PTI-B2014-2005	Source-wide PTI for last ROP.	Source-wide

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUGWAIRSTRIPPERS.

A monthly grab sample shall be taken from the influent and effluent water streams and the pound per hour month emission rate shall be determined. The VOC concentration shall be extrapolated to a tons per month emission rate. The tons per year VOC emission rate shall be the total tons per month since January 1 of that year. Each monthly tons per month emission rate shall be added to the previous tons per month emission rate since January 1 of that year.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

Appendix 9. Routine Maintenance and Malfunction Abatement Plans

The permittee shall comply with the following routine maintenance and malfunction abatement procedures to determine compliance with the applicable requirements referenced in FGFABFILTER1. The permittee shall keep records of the actions taken to implement this plan.

Routine Maintenance and Malfunction Abatement Plan

1. The filter tube is the heart of the system. Care should be exercised in keeping the filter tubes from getting moist or exposing to harmful chemical vapors.
2. If the system is properly sized for air and dust loads, little routine maintenance is required. As time goes by, dry cleaning of the tube media may be deemed necessary. This may occur after a number of months or years of

operation. Occasional removal of a tube and frame should be done to note the condition. Once every four months of operation would not be excessive for routine inspection of the tubes and frames.

3. The time and diaphragm valve require no routine maintenance or inspection. However, occasional checking of the pressure gauge (to read 7.5 psi) should be made to be sure that the proper pulse pressure is being maintained. The pulse pressure will vary with atmospheric temperature and "aging" of components.
4. If the air pump is operating and the timer is electrically pulsing the solenoid valve, but the valve is not dumping air from the reservoir tank, service is necessary:
 - a. If there is no dumping of air and the gauge shows high pressure (over 7.5 psi) there is a fault with the solenoid valve. The solenoid valve may be getting no electricity, may have a burned out coil, or the plunger is stuck closed.
 - b. If there is no dumping of air and the gauge shows very low pressure (under 3 psi or zero) there is a fault within the diaphragm valve, or the plunger or the solenoid valve is stuck open. Placing your thumb over the outlet port of the solenoid valve may cause the pressure to rise - releasing your thumb will dump the reservoir tank - indicating a faulty solenoid valve.
5. If the above test is negative, the pilot diaphragm may be leaking. A quick check can be made using the "thumb" technique above. Assistance may be needed to check by finger plugging all of the pilot vent holes around the top cover of the main valve, noticing the pressure rise as before. If the pressure rises and then dumps upon suddenly remove a finger, then pilot diaphragm is not seating and/or may need replacement. It may only be necessary, in the advent of an improperly seated pilot diaphragm, to merely loosen the machine cap screws that hold the pilot cap to the cover of the diaphragm valve. Loosen the screws two or three revolutions, take the solenoid valve off, and insert a thin rod (a wire coat hanger works fine) down through the hole pressing on the pilot diaphragm causing it to seat firmly. As one person does this, have the other tighten the screws.
6. If the above test fails to raise the pressure, then the fault must occur within the main diaphragm or the main diaphragm seating.
7. Air pump service involves checking of the belt drive tension and oil levels. The inlet filter/silencer should also be periodically checked, every four months maximum, and cleaned of atmospheric dust buildup.
8. The gearbox should be checked for oil level prior to initial startup and for level and potential leaks once a month thereafter. Follow manufacturer's lubrication schedule. The chain slack-side tightener should be re-adjusted every four months to keep chain slack to a minimum. The drive chain in the drive section body assembly should be checked periodically for alignment and proper tension. This chain should be removed, soaked in solvent until clean, then dried and soaked in number ten (S.A.E.) oil. Excess surface oil should be wiped off.
9. Clearance should be occasionally checked from manifold nozzles to the top side of the tube frames - a gap of approximately $\frac{1}{4}$ " is desirable. Avoid metal to metal contact or wide gaps. Adjust bolts on flange end of manifold in slotted holes as necessary to obtain proper gap.