

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

EFFECTIVE DATE: May 7, 2021

ISSUED TO

Aquatic Company

State Registration Number (SRN): B2025

LOCATED AT

888 West Broadway, Three Rivers, Saint Joseph County, Michigan 49093

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2025-2021

Expiration Date: May 7, 2026

Administratively Complete ROP Renewal Application Due Between
November 7, 2024 and November 7, 2025

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B2025-2021

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

Michigan Department of Environment, Great Lakes, and Energy

Rex Lane

Rex Lane, 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 Environment, Great Lakes, and Energy (EGLE) or his or her designee.

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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).² **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

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

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

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
- The applicable requirements are included and are specifically identified in the ROP.
 - 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:
- 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))**
 - 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))**
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 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, EGLE.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUGEL-COAT	Spray application of polyester/styrene surface color coat	01-03-1971	FGMACT_WWWWW FGFRPFABRICATION
EUFIRST-LAM	Spray application of fiberglass and polyester/styrene resin.	01-03-1971	FGMACT_WWWWW FGFRPFABRICATION
EUSECOND-LAM	Second coat spray application of fiberglass and polyester/styrene resin.	01-03-1971	FGMACT_WWWWW FGFRPFABRICATION
EUTHIRD-LAM	Third coat spray application of fiberglass and polyester/styrene resin.	01-03-1971	FGMACT_WWWWW FGFRPFABRICATION
EUROLL-OUT	Hand rolling of fiberglass and polyester/styrene resin.	01-03-1971	FGMACT_WWWWW FGFRPFABRICATION
EUSOLVENT-USAGE	Solvents for cleaning resin contaminated tools used to manufacture fiberglass reinforced plastic products and to wipe molds clean in the mold repair area. Also, those used as a diluent for gelcoat in repairing defective units.	01-03-1971	FGFRPFABRICATION
EUPAINT	Small air driven portable paint gun and aerosol spray can usage to spray paint identification numbers on the back of product.	11-01-2009	FGRULE287(2)(c)
EUMOLDREPAIR	Materials used in the mold repair area. Process is mostly uncontrolled.	01-03-1971	FGMACT_WWWWW
EUPRODUCTREPAIR	Touch-up of product with gelcoat, if needed, prior to shipping. Process is uncontrolled	01-03-1971	FGMACT_WWWWW FGRULE287(2)(c)
EURESINTANKS	Two 7,000 gallon resin storage tanks. Process is uncontrolled.	01-01-2006	FGMACT_WWWWW
EUMIXERS	Three mixers in the resin room used to combine bulk resin and additives to make the material sprayed through the guns. The mixers have covers, but are not controlled by the regenerative thermal oxidizers (RTO).	01-03-1971	FGMACT_WWWWW

D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACT_WWWW	The existing open molding source engaged in the production of reinforced plastic composites as identified in 40 CFR, Part 63, Subpart WWWW 63.5810(c). It also includes cleaning, mixing, HAP containing materials storage, and repair operations associated with the production of plastic composites. The Facility uses a rotary concentrator, an RTO, and permanent total enclosure as necessary to comply with the MACT 12-month rolling weighted average emission limit.	EUGEL-COAT EUFIRST-LAM EUSECOND-LAM EUTHIRD-LAM EUROLL-OUT EUMOLDREPAIR EUPRODUCTREPAIR EURESINTANKS EUMIXERS
FGFRPFABRICATION	Fiberglass reinforced plastic spray-up operation, including gelcoat and fiberglass/resin steps performed on an assembly line basis	EUGEL-COAT EUFIRST-LAM EUSECOND-LAM EUTHIRD-LAM EUROLL-OUT EUSOLVENT-USAGE
FGRULE287(2)(c)	Any existing or future emission units that emit air contaminants that are exempt from the requirements of R 336.1201, pursuant to R 336.1278 and R 336.1287(c).	EUPAINT EUPRODUCTREPAIR

**FGMACT_WWWW
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

The existing open molding source engaged in the production of reinforced plastic composites as identified in 40 CFR, Part 63, Subpart WWWW 63.5785(a), and using the compliance option in 63.5810(c). It also includes cleaning, mixing, HAP containing materials storage, and repair operations associated with the production of plastic composites. The Facility uses a rotary concentrator, an RTO, and permanent total enclosure as necessary to comply with the MACT 12-month rolling weighted average emission limit.

Emission Unit: EUFIRST-LAM, EUSECOND-LAM, EUTHIRD-LAM, EUGEL-COAT, EUROLL-OUT, EUMOLDREPAIR, EUPRODUCTREPAIR, EURESINTANKS, EUMIXERS

POLLUTION CONTROL EQUIPMENT

Rotary concentrator and RTO

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	88 lb/ton of resin	12-month rolling average	FGMACT_WWWW	SC VI.1	40 CFR 63.5810(c)
2. Organic HAP	267 lb/ton of gelcoat	12-month rolling average	FGMACT_WWWW	SC VI.1	40 CFR 63.5810(c)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall monitor, calibrate, maintain and operate the add-on control device according to the procedures in 40 CFR, Part 63.983, 63.995, and 63.996.² **(40 CFR 63.5855, 40 CFR Part 63 Subpart SS)**
2. The permittee shall be in compliance at all times with the following work practice standards² **(40 CFR 63.5805(b), (g) and Table 4 40 CFR 63.5835(a)):**
 - a. Shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
 - b. Shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. Shall use mixer covers with no visible gaps present in the covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
 - c. Shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95% efficient control device are exempt from this requirement.
 - d. Shall keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels.
 - e. Mixing containers less than or equal to 5 gallons may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin).

3. For periods when the permittee is taking credit for capture and control efficiency of the control system, the permittee shall always operate and maintain FGMACT_WWWW, including the control device and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). **(40 CFR 63.5835(c))**
4. 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).² **(40 CFR 63.5835(d))**
5. The permittee shall not take credit for the capture and control efficiency of the control system for FGMACT_WWWW unless the RTO is operating in a satisfactory manner. Satisfactory operation of the RTO includes maintaining a minimum combustion chamber temperature of at least 1600°F. **(40 CFR 63.995(a)(2) and (c), 40 CFR 63.996(c)(6))**
6. The permittee shall not take credit for the capture and control efficiency of the control system for FGMACT_WWWW unless the rotary concentrator is operating in a satisfactory manner. Satisfactory operation of the rotary concentrator includes maintaining a minimum desorption temperature of at least 349°F. **(40 CFR 63.995(a)(2) and (c), 40 CFR 63.996(c)(6))**
7. The permittee shall not operate FRFRPFABRICATION except in compliance with the annual average organic HAP emissions limits in 40 CFR, Part 63, Subpart WWWW, Table 3.² **(40 CFR 63.5805(b) and (g))**
- 3.

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall verify HAPs emission rates from FGMACT_WWWW by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 63, Appendix A. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
2. The permittee shall verify the HAPs emission rates from FGMACT_WWWW, at a minimum, every five years from the date of the last test. **(40 CFR 63.5845, R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**
4. The permittee shall conduct each performance test, performance evaluation, and design evaluation in accordance with 40 CFR, Part 63, Subpart WWWW and 40 CFR Part 63.997.² **(40 CFR 63.5850, 40 CFR Part 63 Subpart SS)**
5. The permittee shall follow the procedures below to determine the organic HAP content of resins and gelcoats when using information supplied by the material manufacturer² **(40 CFR 63.5797):**
 - a. Include the organic HAP total each organic HAP that is present at 0.1% by mass or more for OSHA-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other organic HAP compounds. **(40 CFR 63.5797(a))**
 - b. If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by USEPA Method 311 of Appendix A to 40 CFR, Part 63, exceeds the upper limit of the range of the total organic HAP content provided by

the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance. **(40 CFR 63.5797(b))**

- c. If the organic HAP content is provided as a single value, that value may be used to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the provided value may still be used to demonstrate compliance. If the measured organic HAP content exceeds the provided value by greater than or equal to 2 percentage points, then the measured organic HAP content must be used to determine compliance. **(40 CFR 63.5797(c))**

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 each month that they meet the weighted average of the organic HAP emission limits that apply using the procedures in 40 CFR 63.5810(c). **(40 CFR 63.5810(c))**
2. If the permittee uses a resin or gelcoat application technology (new or existing), whose emission characteristics are not represented by the equations in Table 1 of 40 CFR, Part 63, Subpart WWWW, then the procedures in 40 CFR 63.5798(a) or (b) may be used to establish an organic HAP emissions factor. **(40 CFR 63.5798)**
3. The permittee shall complete any calculations necessary to demonstrate compliance with the applicable emission limits within 30 days after the end of each month. **(40 CFR 63.5810)**
4. The permittee shall establish the add-on control device operating limit in 40 CFR 63.996(c)(6) that applies. **(40 CFR 63.5860(b), 40 CFR Part 63 Subpart SS)**
5. The permittee shall maintain the following records **(40 CFR 63.5915, 40 CFR Part 63 Subpart SS)**:
 - a. A copy of each notification and report that is submitted to comply with 40 CFR, Part 63, Subpart WWWW, and the documentation supporting each notification report, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - b. The records in 40 CFR 63.6(e)(3)(iii)-(v) related to startup, shutdown and malfunction.
 - c. Records of performance tests, design, and performance evaluations are required in 40 CFR 63.10(b)(2).
 - d. All records required in 40 CFR, Part 63.998, to show continuing compliance with Subpart WWWW.
 - e. All data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for operations listed in Table 3 of 40 CFR, Part 63, Subpart WWWW.
 - f. A certified statement that you are in compliance with the applicable work practice requirements Table 4 of 40 CFR, Part 63, Subpart WWWW.
6. The permittee shall collect and keep a record of data as indicated in 40 CFR, Part 63.998 during production. **(40 CFR 63.5895(a), 40 CFR Part 63 Subpart SS)**
7. The permittee shall monitor and collect data as follows **(40 CFR 63.5895(b))**:
 - a. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that FGMACT_WWWW is operating and the permittee is taking credit for capture and control efficiency.
 - b. Not use data recorded during monitoring malfunction, associated repairs, and required quality assurance or control activities for demonstrating continuous compliance, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. All data collected during all other periods in assessing the operation of the control device and associated control system shall be used and the permittee is taking credit for capture and control efficiency.
 - c. At all times, maintain necessary parts for routine repairs of the monitoring equipment.
 - d. All monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

8. The permittee shall collect and keep records of resin and gelcoat use, organic HAP content, and operation where the resin is used. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. **(40 CFR 63.5895(c))**
9. The permittee shall demonstrate continuous compliance with each applicable standard in 40 CFR 63.5805 as follows **(40 CFR 63.5900(a), 40 CFR Part 63 Subpart SS)**:
 - a. Compliance with organic HAP emission limits may be demonstrated by either following the procedures in 40 CFR, Part 63.983 and 63.996 or by using a continuous emission's monitor as an alternative to control parameter monitoring.
 - b. Compliance with organic HAP emission limits is demonstrated by maintaining an organic HAP emission factor value less than or equal to the appropriate organic HAP emission limit listed in Table 3 of 40 CFR, Part 63, Subpart WWWW, on a 12-month rolling average.
 - c. Compliance with the work practice standards in Table 4 of 40 CFR, Part 63, Subpart WWWW is demonstrated by performing the work practices required as applicable.
10. The permittee shall maintain all required records in the form and for the length of time specified below **(40 CFR 63.10(b)(1), 40 CFR 63.5920)**:
 - a. In a manner such that they can be readily accessed and are suitable for inspection.
 - b. For 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record.
 - c. Keep each record onsite for at least 2 years. They may be kept offsite for the remaining 3 years.
 - d. You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.
11. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis during operation. Temperature data recording shall consist of measurement made at equally spaced intervals, not to exceed 15 minutes per interval. **(40 CFR 63.998(c)(2)(i))**
12. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the rotary concentrator desorption inlet to monitor and record the rotary concentrator inlet temperature on a continuous basis during operation. Temperature data recording shall consist of measurement made at equally spaced intervals, not to exceed 15 minutes per interval. **(40 CFR 63.998(c)(2)(i))**
13. The permittee shall comply with one of the following types of bypass monitoring **(40 CFR 63.983(b)(4))**:
 - a. If a flow indicator is used, take a reading at least once every 15 minutes.
 - b. If the bypass line valve is secured in the non-diverting position, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position, and the vent stream is not diverted through the bypass line.
14. The permittee shall conduct an annual inspection of the closed vent system according to the procedures in 40 CFR 63.983(c). If there is an indication of a leak the permittee shall comply with the provisions of 40 CFR 63.983(d). **(40 CFR 63.983(b)(1)(ii), 40 CFR 63.983(d))**
15. The permittee shall monitor and record on a monthly basis the pressure drop across the concentrator heat exchanger. If the pressure drop is outside of the range -1.00-5.00 inches of water the permittee shall investigate and perform any necessary corrective action. **(40 CFR 63.998(c)(2)(i))**
16. The permittee shall monitor and record annually the rotational speed of the concentrator. If the speed is outside of the range 3.5-4.5 revolutions per hour the permittee shall investigate and perform any necessary corrective action. **(40 CFR 63.998(c)(2)(i))**
17. The permittee shall annually perform and record the results of an internal observation of the concentrator's adsorbent material for signs of contamination, erosion, channeling, etc. If problems are observed the permittee shall investigate and perform any necessary corrective action. **(40 CFR 63.998(c)(2)(i))**

18. The permittee shall monitor and record the pressure drop across the concentrator adsorbent quarterly. If pressure drop is outside of the range 2.2-3.2 inches of water, the permittee shall investigate and perform any necessary corrective action. **(40 CFR 63.998(c)(2)(i))**

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 any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. At least 60 calendar days before a performance test is scheduled to begin, the permittee shall submit to the AQD a notification of intent to conduct a performance test, notification of the date for the test in accordance with 40 CFR 63.347(d) and a complete test plan that is in accordance with the applicable federal Reference Methods and 40 CFR, Part 63, Appendix A. The final test plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete test reports and notification of compliance status as specified in Table 13 of 40 CFR, Part 63, Subpart 13, within 60 calendar days after completion of the test.² **(40 CFR Part 63 Subpart A, 40 CFR 63.5905(a), 40 CFR 63.9(e)(g) and (h))**
6. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.5910(a) at the same time as the report specified in condition VII.2. The semiannual compliance report shall include the following **(40 CFR 63.5910(a) and (b)(5))**:
 - a. Company name and address; certification of the truth, accuracy, and completeness of the content of the report by the responsible official; date of the report and the beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(1, 2, and 3))**
 - b. A statement that there were no deviations during the reporting period if there were no deviations from the applicable emission limits (emission, operating, opacity, and VE limit(s)) and there were no deviations from the applicable requirements for work practice standards in Table 4 of 40 CFR, Part 63, Subpart WWWW. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, were out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period. **(40 CFR 63.5910(c)(5) and (6) Table 14(1.a))**
 - c. The information in 40 CFR 63.5910(d) if you have a deviation from any emission limit *emission or operating limit, or work practice standard) during the reporting period. If there were periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control, as specified in § 63.8(c)(7), the report must contain the info in §63.5910€. **(40 CFR 63.5900(b), 40 CFR 63.5910(d) and (g) Table 14(1.b))**
 - d. The information in §63.10(d)(5)(i) if you had a start-up, shut down, malfunction during the reporting period, and you took actions consistent with your SSM plan. **(40 CFR 63.5910(c)(4) and (g) Table 14(1.c))**
7. The permittee shall submit an immediate SSM report if a startup, shutdown, malfunction event occurs that is not consistent with the company's SSM Plan. Within two working days the permittee shall submit by fax or telephone a report of the actions taken for the event. Within seven working days after the end of the event, unless alternative arrangements have been made with the permitting authority, the permittee shall submit a letter that contains the information in 40 CFR 63.10(d)(5)(ii). **(40 CFR 63.5910(a) Table 14(2))**

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:

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 WWWW, for Reinforced Plastic Composites Production by the initial compliance date.² **(40 CFR Part 63 Subparts A and WWWW)**
2. The permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart SS.² **(40 CFR 63.5805(h))**

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).

**FGFRPFABRICATION
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Fiberglass reinforced plastic spray-up operation, including gelcoat and fiberglass/resin steps performed on an assembly line basis.

Emission Unit: EUGEL-COAT, EUFIRST-LAM, EUSECOND-LAM, EUTHIRD-LAM, EUROLL-OUT, EUSOLVENT-USAGE

POLLUTION CONTROL EQUIPMENT

Roll media (fiberglass tack filters) and rotary concentrator and RTO

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGFRPFABRICATION unless all exhaust filters are in place and operating properly in the corresponding booth. **(R 336.1910)**
2. The permittee shall capture and store all waste resins, gelcoats, catalysts and acetone in closed containers and dispose of them in an acceptable manner in compliance with all state rules and federal regulations.¹ **(R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using USEPA Test Method 311.² **(R 336.1201(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a record of the dates and times that FGFRPFABRICATION operates without taking credit for the add-on control device. **(R 336.1213(3))**
2. The permittee shall maintain the following records and emission calculations² **(40 CFR Part 63 Subpart WWWW)**
 - a. Pounds of each gelcoat and lamination resin used each calendar month and 12-month rolling time period.
 - b. The as-supplied styrene, VOC and vapor suppressant content of each gelcoat and lamination resin.
 - c. Styrene and VOC mass emission calculations determining monthly emission rates in tons per month. These calculations shall be performed using factors consistent with 40 CFR, Part 63, Subpart WWWW.

- d. Styrene and VOC mass emission calculations determining the yearly emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - e. The permittee shall maintain the following records and emission calculations for cleanup and purge solvents:
 - i. Density, in pounds per gallon, of each solvent.
 - ii. The VOC and HAP content, in pounds per gallon, of each solvent used.
 - iii. Gallons of solvent emitted monthly and on a 12-month rolling time period, based on usage minus reclaim.
3. The permittee shall maintain a current listing from the manufacturer of the chemical composition (including VOC, free styrene, and acetone) of each material used (i.e., resin, gelcoat, cleanup solvent, etc.). The data shall consist of information provided by the material manufacturer and be adequate for determining the HAP content of each material as specified in 40 CFR 63.5797.² **(40 CFR Part 63 Subpart WWWW)**
4. Perform visual installation inspection of each of the primary particulate exhaust filters at each booth on a daily basis, during maximum routine operating conditions. **(R 336.1213(3))**

See Appendix 3

VII. REPORTING

- 1. 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 any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
- 5. The permittee shall keep any reports or notifications required by 40 CFR, Part 63, Subpart WWWW, in a format acceptable to the AQD District Supervisor, and submit them by the 30th day of the calendar month after the end of the period covered by such reports or notifications, unless another time period is specified in another requirement.² **(R 336.1213(3)(c), 40 CFR Part 63 Subpart WWWW)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-RTO	68 ¹	30 ¹	R 336.1901

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

FGRULE287(2)(c)
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units installed on or after December 20, 2016:

Emission Units installed prior to December 20, 2016: EUPAINT, EUPRODUCTREPAIR

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

See Appendix 4

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. Acronyms and Abbreviations

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

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

The permittee shall perform visual inspections to determine the integrity of the dry filters on a daily basis. The visual inspection should determine whether the dry filters are installed and operating properly. The filters should fit snugly and have no gaps or holes. The permittee should also check for leaks and overspray that may escape the filters. Results of the visible inspections shall be recorded daily and kept on file for the most current five year period.

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

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2025-2015. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2025-2015 is being reissued as Source-Wide PTI No. MI-PTI-B2025-2021.

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

Appendix 7. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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