

**MICHIGAN DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
AIR QUALITY DIVISION**

EFFECTIVE DATE: April 18, 2011

ISSUED TO:
AAR Mobility Systems

State Registration Number (SRN): B4197

LOCATED AT:
201 Haynes Street, Cadillac, Michigan 49601

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B4197-2011

Expiration Date: April 18, 2016

Administratively Complete ROP Renewal Application Due Between 10/18/2014 and 10/18/2015

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-B4197-2011

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 Natural Resources and Environment

Janis Denman, Cadillac District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Natural Resources and Environment (MDNRE) 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), R 336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source- wide PTI No. MI-PTI-B4197- 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))**:
- The date, location, time, and method of sampling or measurements.
 - The dates the analyses of the samples were performed.
 - The company or entity that performed the analyses of the samples.
 - The analytical techniques or methods used.
 - The results of the analyses.
 - 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))**
- 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).
 - 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.
 - 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, MDNRE. 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, MDNRE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. ² **(R 336.1201(4))**

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUAIRSTRIPPER	Removal of VOCs from groundwater purged from the aquifer beneath the plant.	1/30/1985 4/9/1985	NA
EU197LINE	One dry filter paint booth, two ovens, controlled by the Regenerative Thermal Oxidizer (RTO).	8/16/1994 12/14/2000	FGCOATINGS FGMACT
EU197LINENOCTRL	Same dry filter paint booth, and oven as EU197LINE using coatings containing p-chlorobenzotrifluoride (CAS # 98-56-6) (PCBTF). The RTO control system is disconnected during operation of this emission unit and no control is required. Organic vapor emissions generated from this emission unit are emitted through a separate bypass stack.	8/16/1994 2010	FGMACT
EUCONTAINERLINE	One prime filter paint booth with two manual applicators, one dry filter paint booth with two manual applicators, one oven, and cleanup and purge activities controlled by the RTO.	9/29/1992 8/16/1994 12/14/2000	FGCOATINGS FGMACT
EUCONTNRNOCTRL	This is the same filter paint booth with two manual applicators as EUCONTAINERLINE using coatings containing PCBTF. The RTO control system is disconnected during operation of this emission unit and no control is required. Organic vapor emissions generated from this emission unit are emitted through a separate bypass stack.	12/14/2000	FGMACT
EUBALSACORE	Consists of a Panel Core Load, computer network control (CNC) Router, Panel Core Duster, 48" Glue Spreader, Edge Adhesive Spray Chamber, Panel Core Transfer Stand Up, Infrared Pass-Thru Oven (Max. Temp – 400°F), Cool Down, and Panel Core Unload controlled by the RTO. Also, the wood chip/dust (particulates) emissions will be directed to existing wood baghouse. Subsequently, it will be vented in-plant.	2009	FGCOATINGS FGMACT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSKINORRAIL	Consists of an Entrance Conveyor, a Glue Spray Booth, a Transfer Conveyor, and Infrared Drying Oven (Max. Temp – 400°F), a Cooling Booth and an Unload Unit controlled by the RTO.	2009	FGCOATINGS FGMACT
EUCLEANUP	All cleanup and purge activities performed in various emission units. EU197LINENOCTRL and EUCONTRNOCTRL have no controls. The Regenerative Thermal Oxidizer (RTO) is used as a control device for the rest.	12/14/2000	FGCOATINGS FGMACT
EUGRIND/PAINT	Grind and paint operations in the lakeside building (rebuilding of pallets and containers) emissions released into the in-plant atmosphere.	12/1/1966	NA
EULMS	Router, and saw, controlled by a cyclone.	12/1/1996	FGPARTICULATES
EUWOODROOM	One horizontal band saw, one vertical band saw, one straight-line rip saw, one trim saw, one belt sander controlled by a baghouse.	10/18/1979	FGPARTICULATES
EURULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	NA	FGRULE290
EURULE287(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and Rule 287(c).	NA	FGRULE287(c)

**EUAIRSTRIPPER
 EMISSION UNIT CONDITIONS**

DESCRIPTION Removal of volatile organic compounds from groundwater purged from the aquifer beneath the plant.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT Packed scrubber tower

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. 1,2 Dichloroethane	3.69 milligrams per cubic meter, corrected to 70°F and 29.92 inches Hg ¹		EUAIRSTRIPPER	Conditions VI.1 and VI.2	R 336.1224, R 336.1225
2. 1,1,2,2 Tetra-chloroethylene	2.58 milligrams per cubic meter, corrected to 70°F and 29.92 inches Hg ¹		EUAIRSTRIPPER	Conditions VI.1 and VI.2	R 336.1224, R 336.1225
3. Trichloroethylene	15.8 milligrams per cubic meter, corrected to 70°F and 29.92 inches Hg ¹		EUAIRSTRIPPER	Conditions VI.1 and VI.2	R 336.1224, R 336.1225
4. Total volatile organic compounds	0.19 pounds ²	Per hour	EUAIRSTRIPPER	Conditions VI.1, VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. NA

V. TESTING/SAMPLING

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

1. NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the 1,2 dichloroethane, 1,1,2,2 tetrachloroethylene, trichloroethylene and total VOC concentrations in the water influent and effluent streams from EUAIRSTRIPPER on a monthly basis. **(R 336.1213(3)(b))**
2. By the tenth day of each calendar month, the permittee shall calculate and record the 1,2 dichloroethane, 1,1,2,2 tetrachloroethylene, and trichloroethylene emissions, in milligrams per cubic meter corrected to 70°F and 29.92 inches Hg, for the previous month. **(R 336.1213(3)(b))**
3. By the tenth day of each calendar month, the permittee shall calculate and record the total volatile organic compound emission rate, in pounds per hour, for the previous month. **(R 336.1213(3)(b))**

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))**

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. SVAIRSTRIPPER	8 ¹	50 ¹	R 336.1224, R 336.1225

IX. OTHER REQUIREMENT(S)

- 1. 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).

**EU197LINENOCTRL
 EMISSION UNIT CONDITIONS**

DESCRIPTION One dry filter paint booth with two manual applicators, one oven. This emission unit uses coatings with a VOC content **equal to or less than** 1.8 pounds of VOC per gallon of coating, minus water, as applied.

Flexible Group ID: FGMACT

POLLUTION CONTROL EQUIPMENT Fabric filter. The Regenerative Thermal Oxidizer (RTO) control system is disconnected during operation of this emission unit and no control is required for organic vapor emissions generated from coating or cleanup and purge activities.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile organic compounds (VOC)	3.1 tons ²	Per 12-month rolling time period as determined at the end of each calendar month	EU197LINENOCTRL	Condition VI.3	R 336.1205, R 336.1702(a)
2. p-chloro-benzotrifluoride (CAS # 98-56-6)	105.2 pounds ¹	Per Calendar Day	EU197LINENOCTRL	Conditions VI.2, VI.4	R 336.1225, R 336.1901
3. p-chloro-benzotrifluoride (CAS # 98-56-6)	12.3 tons ¹	Per 12-month rolling time period as determined at the end of each calendar month	EU197LINENOCTRL	Conditions VI.2, VI.4	R 336.1224

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coatings	Less than or equal to 1.8 pounds of VOC per gallon of coating, minus water, as applied. ²		EU197LINENOCTRL	V.1	R 336.1205, R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste coatings, reducers, thinners, and cleanup and purge solvents and shall store them in closed containers. The permittee shall dispose of all waste coatings, reducers, thinners, and purge and clean-up solvents in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)
- The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² (R 336.1224, R 336.1370)

3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, thinners, and purge and clean-up solvents, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
4. The permittee shall not operate EU197LINENOCTRL unless all purge and cleanup activities are performed within the EU197LINENOCTRL spray booth during operation of the spray booth exhaust system. The coating line spray booth and oven exhaust systems shall bypass the RTO control system when operating as EU197LINENOCTRL.¹ **(R 336.1225, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU197LINENOCTRL unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1331, R 336.1901, R 336.1910)**
2. The permittee shall equip and maintain EU197LINENOCTRL with HVLP or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.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 of each coating, minus water, as applied. The VOC content shall be tested using Method 24. Coatings shall be tested once per year or as soon as new coatings are put into regular use. Alternately, the VOC content may be determined from manufacturer's formulation data, derived from Method 24 analysis on a batch specific basis, with written approval by the AQD District Supervisor.² **(R 336.1213(3)(a), R 336.1702(a))**

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, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1213(3))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, thinner, and purge and clean-up solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1213(3))**
3. The permittee shall keep separate records of the following for EU197LINENOCTRL.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1213(3))**
 - a. The identity of each coating, and reducer;
 - b. The VOC content of each coating, and reducer used (minus water and with water) as received and as applied;
 - c. The daily usage rate of each coating and reducer as applied;
 - d. Daily hours of operation of EU197LINENOCTRL;
 - e. VOC emission calculations in a format acceptable to the AQD District Supervisor to determine a monthly emission rate in tons per month and a 12-month rolling time period emission rate as determined at the end of each calendar month for EU197LINENOCTRL.

4. The permittee shall maintain the following records for EU197LINENOCTRL.² **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1213(3))**
 - a. Gallons (with water) of each p-chlorobenzotrifluoride (CAS # 98-56-6) containing material used per day.
 - b. Where applicable, gallons (with water) of each p-chlorobenzotrifluoride (CAS # 98-56-6) containing material reclaimed per day.
 - c. The p-chlorobenzotrifluoride (CAS # 98-56-6) content (with water) in pounds per gallon of each material used.
 - d. P-chlorobenzotrifluoride (CAS # 98-56-6) mass emission calculations determining the calendar day emission rate in pounds per calendar day for EU197LINENOCTRL.
 - e. P-chlorobenzotrifluoride (CAS # 98-56-6) mass emission calculations determining the emission rates for EU197LINENOCTRL in tons per calendar month.
 - f. P-chlorobenzotrifluoride (CAS # 98-56-6) mass emission calculations determining the emission rates in tons per 12-month rolling time period, as determined at the end of each calendar month, for EU197LINENOCTRL.

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)

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. SV197BTHSTK	34 ²	60 ²	R 336.1225, R 336.1901, 40 CFR 52.21 Subparts C and D
2. SV197OVNSTK	8 ²	60 ²	R 336.1225, R 336.1901, 40 CFR 52.21 Subparts C and D

IX. OTHER REQUIREMENT(S)

1. 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).

**EUCONTNRNOCTRL
 EMISSION UNIT CONDITIONS**

DESCRIPTION One prime filter paint booth with two manual applicators, one dry filter paint booth with two manual applicators, one oven, and cleanup activities. This emission unit uses coatings with a VOC content **equal to or less than** 3.5 pounds of VOC per gallon of coating, minus water, as applied.

Flexible Group ID: FGMACT

POLLUTION CONTROL EQUIPMENT Fabric filter, The Regenerative Thermal Oxidizer (RTO) control system is disconnected during operation of this emission unit and no control is required for organic vapor emissions generated from coating or cleanup and purge activities. Emissions are vented through a bypass stack.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile Organic Compounds (VOC)	10.5 pounds ²	Per hour	EUCONTNRNOCTRL	Conditions VI.1, VI.2	R 336.1205, R 336.1225
2. VOC	17.1 tons ²	Per 12-month rolling time period as determined at the end of each calendar month	EUCONTNRNOCTRL	Conditions VI.1, VI.2	R 336.1205, R 336.1702(a)
3. p-chloro-benzotrifluoride (CAS # 98-56-6)	24.3 tons ¹	Per 12-month rolling time period as determined at the end of each calendar month	EUCONTNRNOCTRL	Conditions VI.1, VI.3	R 336.1224
4. p-chloro-benzotrifluoride (CAS # 98-56-6)	256.0 pounds ¹	Per Calendar Day	EUCONTNRNOCTRL	Conditions VI.1, VI.3	R 336.1225, R 336.1901

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coatings	Less than or equal to 3.5 pounds of VOC per gallon of coating, minus water, as applied. ²		EUCONTNRNOCTRL	Condition V.1	R 336.1205, R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUCONTNRNOCTRL unless all purge and cleanup activities are performed within one of the EUCONTNRNOCTRL spray booths during operation of the spray booth exhaust system.¹ **(R 336.1225, R 336.1901)**
2. The permittee shall insure that the coating line spray booth and oven exhaust systems will bypass the RTO control system when operating as EUCONTNRNOCTRL while applying coatings containing p-chlorobenzotrifluoride (CAS # 98-56-6) by permanently re-wiring the controls to prevent operation of the RTO during usage of these coatings.¹ **(R 336.1225, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUCONTNRNOCTRL with HVLP or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.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 of each coating, minus water, as applied. The VOC content shall be tested using Method 24. Coatings shall be tested once per year or as soon as new coatings are put into regular use. Alternately, the VOC content may be determined from manufacturer's formulation data, derived from Method 24 analysis on a batch specific basis, with written approval by the AQD District Supervisor.² **(R 336.1213(3)(a), R 336.1702(a))**

See Appendix 5

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 a current listing of the chemical composition of each coating, including the weight percent of each component. The data may consist of Method 24 analysis or manufacturer's formulation data.² **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall keep separate records of the following for EUCONTNRNOCTRL²: **(R 336.1213(3), R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**
 - a. The identity of each coating, and reducer;
 - b. The VOC content of each coating, and reducer used (minus water and with water) as received and as applied;
 - c. The daily usage rate of each coating and reducer as applied;
 - d. Daily hours of operation of EUCONTNRNOCTRL;
 - e. Daily VOC emission calculations in a format acceptable to the AQD District Supervisor to determine the daily average hourly emission rates in pounds per hour for EUCONTNRNOCTRL.
 - f. VOC emission calculations in a format acceptable to the AQD District Supervisor to determine a monthly emission rate in tons per month and a 12-month rolling time period emission rate as determined at the end of each calendar month for EUCONTNRNOCTRL.
3. The permittee shall maintain the following records for EUCONTNRNOCTRL.² **(R 336.1213(3), R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**
 - a. Gallons (with water) of each p-chlorobenzotrifluoride (CAS # 98-56-6) containing material used per day.
 - b. Where applicable, gallons (with water) of each p-chlorobenzotrifluoride (CAS # 98-56-6) containing material reclaimed per day.

- c. The p-chlorobenzotrifluoride (CAS # 98-56-6) content (with water) in pounds per gallon of each material used.
- d. P-chlorobenzotrifluoride (CAS # 98-56-6) mass emission calculations determining the calendar day emission rate in pounds per calendar day for EUCONTNRNOCTRL.
- e. P-chlorobenzotrifluoride (CAS # 98-56-6) mass emission calculations determining the emission rates for EUCONTNRNOCTRL in tons per calendar month.
- f. P-chlorobenzotrifluoride (CAS # 98-56-6) mass emission calculations determining the emission rates in tons per 12-month rolling time period, as determined at the end of each calendar month, for EUCONTNRNOCTRL.

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))**

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. SVBOOTHSTACK	24 ²	60 ²	R 336.1225, R 336.1901, 40 CFR 52.21 Subparts C and D
2. SVOVENSTACK	8 ²	60 ²	R 336.1225, R 336.1901, 40 CFR 52.21 Subparts C and D

IX. OTHER REQUIREMENT(S)

- 1. 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).

**EUCLEANUP
 EMISSION UNIT CONDITIONS**

DESCRIPTION All cleanup and purge activities performed in various emission units. EU197LINENOCTRL and EUCONTNRNOCTRL have no controls. The Regenerative Thermal Oxidizer (RTO) is used as a control device for the rest.

Flexible Group ID: FGMACT

POLLUTION CONTROL EQUIPMENT RTO

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Acetone (CAS # 67-64-1)	1.7 ton ²	Per 12-month rolling time period as determined at the end of each calendar month	EUCLEANUP	Conditions VI.1, VI.2	R 336.1224

II. MATERIAL LIMIT(S)

1. NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUCLEANUP unless all purge and cleanup activities are performed within an operating spray booth. Purge and cleanup emissions shall be controlled by the RTO control system except for cleanup activities associated with EU197LINENOCTRL and EUCONTNRNOCTRL.² (R 336.1224, R 336.1225, R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUCLEANUP unless the RTO is installed, maintained, and operated in a satisfactory manner except that emissions from cleanup activities associated with EU197LINENOCTRL and EUCONTNRNOCTRL shall bypass the RTO control system. (R 336.1224, R 336.1225, R 336.1910)

V. TESTING/SAMPLING

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

1. 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 a current listing of the chemical composition of each cleanup solvent, including the weight percent of each component. The data may consist of Method 24 analysis or manufacturer's formulation data.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)

2. The permittee shall maintain and keep separate monthly record of the following for EUCLEANUP². **(R 336.1213(3) (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901))**
 - a. The identity of each cleanup and purge solvent;
 - b. The density of the acetone cleanup and purge solvent;
 - c. The amount of acetone cleanup and purge solvent used and reclaimed (if any);
 - d. Daily hours of operation of each emission unit;
 - e. Acetone (CAS # 67-64-1) emission calculations in a format acceptable to the AQD District Supervisor to determine monthly emission rates in tons per month and 12-month rolling time period emission rates in tons per year for EUCLEANUP separately for acetone cleanup and purge solvent usage for emission units that are controlled by the RTO system FGCOATING; and for acetone cleanup and purge solvent usage for EU197LINENOCTRL, EUCONTNRNOCTRL and EUGRIND/PAINT that is not controlled; and for the combined controlled and uncontrolled emissions.

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)

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

1. NA

IX. OTHER REQUIREMENT(S)

1. 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).

**EUGRIND/PAINT
 EMISSION UNIT CONDITIONS**

DESCRIPTION Grind and paint operations in the lakeside building (rebuilding of pallets and containers) emissions released in the in-plant atmosphere. These sources are exempt from the emission limits of R 336.1621(1) pursuant to the exemption listed in R 336.1621(10) but are subject to the emission limits specified in R 336.1621(10) and specific recordkeeping requirements.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile organic Compounds (VOC)	2,000 pounds	Per month	EUGRIND/PAINT	Condition VI.1	R 336.1621(10)(a)
2. VOC	10.0 tons	Per year	EUGRIND/PAINT	Condition VI.1	R 336.1621(10)(a)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. NA

V. TESTING/SAMPLING

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

- The permittee shall determine the VOC content of each coating, minus water, as applied. The VOC content shall be tested using Method 24. Coatings shall be tested once per year or as soon as new coatings are put into regular use. Alternately, the VOC content may be determined from manufacturer's formulation data, derived from Method 24 analysis on a batch specific basis, with written approval by the AQD District Supervisor. **(R 336.1213(3)(a), R 336.1702(a))**

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 separate records of the following for EUGRIND/PAINT: **(R 336.1213(3)(a), R 336.1702(a))**
 - a. The identity of each coating, reducer;
 - b. The VOC content of each coating, and reducer used (minus water and with water) as received and as applied;
 - c. The monthly usage rate of each coating and reducer as applied;
 - d. VOC emission calculations in a format acceptable to the AQD District Supervisor to determine a monthly emission rate in pounds per month and an emission rate in tons per year for EUGRIND/PAINT.

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:

1. NA

IX. OTHER REQUIREMENT(S)

1. 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
FGCOATINGS	All coating processes within the main plant with the exception of Rule 336.1287(c) exempt activities and cleanup and purge activities. EUCLEANUP covers cleanup and purge activities separately. Requires operation of a regenerative thermal oxidation (RTO) system for all emission units.	EU197LINE, EUCONTAINERLINE, EUBALSACORE, EUSKINORRAIL
FGMACT	Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR, Part 63, Subpart Mmmm, 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. 40 CFR, Part 63, Subpart Mmmm does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).	EU197LINENOCTRL, EUCONTNRNOCTRL EU197LINE, EUCONTAINERLINE, EUBALSACORE, EUSKINORRAIL, EUCLEANUP
FGPARTICULATES	Router and saw with a baghouse and one horizontal band saw, one vertical band saw, one straight-line rip saw, one trim saw, one belt sander and a baghouse. Control Equipment: One cyclone and one baghouse.	EUWOODROOM, EULMS, EUBALSACORE
FGRULE287(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and Rule 287(c).	EURULE287(c)
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	EURULE290

FGCOATINGS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION All coating processes within the main plant with the exception of Rule 336.1287(c) exempt activities and cleanup and purge activities. EUCLEANUP covers cleanup and purge activities separately.

Emission Units: EU197LINE, EUCONTAINERLINE, EUBALSACORE, EUSKINORRAIL

POLLUTION CONTROL EQUIPMENT Fabric filter, Regenerative thermal oxidizer (RTO)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile organic compounds (VOC)	25.9 pounds ²	Per hour	FGCOATINGS	Condition VI.6	R 336.1205, R 336.1225, R 336.1702(a)
2. VOC	13.0 tons ²	Per calendar month	FGCOATINGS	Condition VI.6	R 336.1205, R 336.1702(a)
3. VOC	122.3 tons ²	Per 12-month rolling time period as determined at the end of each calendar month.	FGCOATINGS	Condition VI.6	R 336.1205, R 336.1702(a)

II. MATERIAL LIMIT(S)

1. NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any spray booth in any emission unit unless all respective exhaust filters are in place and operating properly.² (R 336.1301, R 336.1331, R 336.1910)
2. The permittee shall not operate FGCOATINGS unless the RTO is installed and operating properly.² (R 336.1225, R 336.1702(a), R 336.1910)
3. The permittee shall not operate FGCOATINGS unless the approved Malfunction Abatement Plan (MAP), or an alternate plan approved by the District Supervisor, is implemented and maintained. If the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the MAP within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.² (R 336.1910, R 336.1911)
4. The overall VOC emissions capture efficiency for the coating processes, shall not be less than 90 percent.² (R 336.1225, R 336.1702(a))
5. The permittee shall maintain a minimum VOC destruction efficiency of 95 percent, by weight, in the RTO.² (R 336.1910)

6. The permittee shall maintain a minimum temperature of 1400°F in the combustion chamber of the RTO.² **(R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall maintain a minimum retention time of 0.5 seconds in the combustion chamber of the RTO.² **(R 336.1910)**
2. The permittee shall install a differential pressure gauge with a visual and/or audible alarm on each dry filter system and maintain the gauges in proper operating condition. **(R 336.1910, 40 CFR 64.6(c)(ii), 40 CFR 64.7(b))**
3. The permittee shall install a temperature monitoring system with a visual and/or audible alarm on the RTO and maintain the gauge in proper operating condition. **(R 336.1213(3)(a), R 336.1910, 40 CFR 64.6(c)(ii), 40 CFR 64.7(b))**

V. TESTING/SAMPLING

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

1. Once every five years, the permittee shall perform capture efficiency testing for the demonstration of compliance with the overall VOC minimum capture efficiency of 90 percent. **(R 336.1213(3)(a), R 336.1225, R 336.1702(a), 40 CFR 64.6(d))**
2. Once every five years, the permittee shall perform destruction efficiency testing for demonstration of compliance with the minimum VOC destruction efficiency of 95 percent. **(R 336.1213(3)(a), R 336.1225, R 336.1702(a))**
3. Once every five years, the permittee shall perform VOC emissions testing to demonstrate compliance with the maximum VOC pounds per hour emission rate limit in I. 1. **(R 336.1213(3)(a), R 336.1225, R 336.1702(a))**

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 a current listing of the chemical composition of each coating, including the weight percent of each component. The data may consist of Method 24 analysis or manufacturer's formulation data.² **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall monitor and record the temperature in the RTO near the combustion chamber outlet on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. The monitor shall be equipped with an audible and/or visual alarm to notify plant personnel if the temperature drops below 1400°F. The permittee shall maintain the monitoring system in proper operating condition. Data collected during malfunctions, repairs, and QA/QC activities shall not be used to satisfy monitoring requirements.² **(R 336.1213(3), R 336.1910, 40 CFR 64.6(c)(1)(i), (ii), and (iii), 40 CFR 64.7(b), 40 CFR 64.7(c))**
3. The permittee shall continuously monitor the differential pressure across each dry filter system and manually record the differential pressure once per shift. The monitor shall be equipped with an audible and/or visual alarm to notify plant personnel if the pressure differentials exceed the values established during the most recent capture efficiency testing which demonstrated a 90 percent capture efficiency. Data collected during malfunctions, repairs, and QA/QC activities shall not be used to satisfy monitoring requirements. **(R 336.1213(3)(a), R 336.1225, R 336.1702(a), 40 CFR 64.6(c)(i) and (iii), 40 CFR 64.7(c))**
4. The permittee shall conduct the compliance assurance monitoring required pursuant to 40 CFR 64 and shall satisfy the requirements specified in 40 CFR 64.7 through 64.9. **(40 CFR 64.6(c)(3), 40 CFR 64.7(a))**
5. Except for defined malfunctions, repairs, and QA/QC activities, the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the RTO is operating. **(R 336.1213(3)(a), 40 CFR 64.7(c))**

6. The permittee shall maintain the following records for FGCOATINGS.² **(R 336.1213(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
 - a. The identity of each coating and reducer;
 - b. The VOC content of each coating and reducer used (minus water and with water) as received and as applied;
 - c. The daily usage rate of each coating and reducer as applied;
 - d. Daily hours of operation of each emission unit in FGCOATINGS;
 - e. Daily VOC emission calculations in a format acceptable to the AQD District Supervisor to determine the daily average hourly emission rates in pounds per hour for FGCOATINGS;
 - f. VOC emission calculations in a format acceptable to the AQD District Supervisor to determine a monthly emission rate in tons per month and a 12-month rolling time period emission rate as determined at the end of each calendar month for FGCOATINGS.

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))**
4. The Compliance Assurance Monitoring (CAM) plan reporting submitted with VII.2 shall include: **(40 CFR 64.9)**
 - a. Summary information on the number, duration, and cause (including unknown cause, if applicable) of exceedances and excursions, as defined in 40 CFR 64.1, and the corrective actions taken;
 - b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than for calibration checks);
 - c. A description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period, if applicable. If a QIP has been completed, the report shall include documentation that the plan has been implemented and reduced the likelihood of similar levels of excursions or exceedances occurring.
6. The permittee shall promptly notify the AQD for the need to modify the CAM plan if it is found to be inadequate and submit a proposed modification to the ROP if necessary. **(40 CFR 64.7(e))**
7. No less than 30 days prior to performing emission testing, capture efficiency testing and destruction efficiency testing, the permittee shall submit test plans to the Air Quality Division. The test plans must be approved by the Air Quality Division prior to testing. **(R 336.1213(3), R 336.1205, R 336.1225, R 336.1702, R 336.1901)**
8. No less than 60 days following the last date of testing, the permittee shall submit emission test, capture efficiency and destruction efficiency test results, in acceptable formats, to the Air Quality Division. **(R 336.1213(3), R 336.1205, R 336.1225, R 336.1702, R 336.1901)**

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. SVRTOSTACK	54 ²	60 ²	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. All purge solvents and waste coatings from all coating applicators used for any coating operation shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1225, R 336.1370, R 336.1702(a), R 336.1901)**
2. Upon detecting an excursion or exceedance, as defined in 40 CFR 64.1, the permittee shall restore operation of FGCOATINGS to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. **(40 CFR 64.7(d))**
3. The permittee shall initiate the MAP if the differential pressure readings averaged over a shift exceed the values established during the most recent capture efficiency testing which demonstrated a 90 percent capture efficiency. **(40 CFR 64.6(c)(2))**
4. The permittee shall initiate the MAP if the temperature of the RTO drops below 1400°F. **(40 CFR 64.6(c)(2))**
5. The permittee shall, at all times, maintain the compliance assurance monitoring, included but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**
6. The permittee shall comply with all of the requirements of 40 CFR 64 (Compliance Assurance Monitoring). **(40 CFR 64.6(c)(3))**

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
FLEXIBLE GROUP CONDITIONS

DESCRIPTION Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR, Part 63, Subpart Mmmm, 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. 40 CFR, Part 63, Subpart Mmmm does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).

Emission Units: EU197LINENOCTRL, EUCONTNRNOCTRL, EU197LINE, EUCONTAINERLINE, EUCLEANUP, EUBALSACORE, EUSKINORRAIL

POLLUTION CONTROL EQUIPMENT Regenerative thermal oxidizer (RTO)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	2.6 lbs per gal of coating solids for existing general use coatings	12-month rolling time period as determined at the end of each calendar month	EU197LINENOCTRL, EUCONTNRNOCTRL, EUCLEANUP, EU197LINE, EUCONTAINERLINE, EUBALSACORE, EUSKINORRAIL,	Conditions V.1, and VI.1 through VI.10	40 CFR 63.3890(b)(1)

II. MATERIAL LIMIT(S)

1. NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. EU197LINENOCTRL, EUCONTNRNOCTRL and EUCLEANUP, shall be in compliance with the emission limit in I.1. at all times when using the emission rate without add-on controls option.² **(40 CFR 63.3900(a)(1))**
2. EU197LINE, EUCONTAINERLINE, EUBALSACORE, EUSKINORRAIL shall be in compliance with the emission limit in I.1.at all times, when using the emission rate with add-on controls option, except during periods of startup, shutdown, and malfunction.² **(40 CFR 63.3900(a)(2)(i))**
3. If the surface coating operations meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.3890(a) or (b), the permittee may comply separately with each subcategory emission limit, or comply using one of the alternatives in 40 CFR 63.3890(c)(1) or (2).² **(40 CFR 63.3890(c))**

4. To meet the emission limit in I.1 the permittee must include all coatings (as defined in 40 CFR 63.3981), thinners and /or other additives, and cleaning materials used in the emission unit in determining whether the organic HAP emission rate is equal to or less than the applicable emission limit. The permittee must use at least one of the three compliance options, compliant material option, Emission rate without add-on controls option, or Emission rate with add-on controls option. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations the permittee must document this switch as required by 40 CFR 63.3890(c), and the permittee must report it in the next semiannual compliance report. **(40 CFR 63.3891)**
5. The permittee is using the emission rate without add-on controls option for EU197LINENOCTRL, EUCONTNRNOCTRL and EUCLEANUP to demonstrate compliance with I.1 therefore the permittee must demonstrate that based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operations the organic HAP emission rate for the coating operations is less than or equal to the limit in I.1 calculated as a rolling 12-month emission rate and determined on a monthly basis.² **(40 CFR 63.3891(b))**
6. The permittee is using the emission rate with add-on controls option on EU197LINE, EUCONTAINERLINE, EUBALSACORE, EUSKINORRAIL (FGCOATING) and EUCLEANUP to demonstrate compliance with I.1 therefore the permittee must demonstrate that based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operations and the emissions reduction achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operations is less than or equal to the limit in I.1 calculated as a rolling 12-month emission rate and determined on a monthly basis. **(40 CFR 63.3891(b))**
7. For EU197LINE, EUCONTAINERLINE, EUBALSACORE, EUSKINORRAIL (FGCOATING) and EUCLEANUP using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR, Part 63, Subpart M as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3967. **(40 CFR 63.3892(b) and Table 1)**

Add-on Control Device	Operating Limit
Thermal oxidizer (FGCOATING)	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).
Emission capture system that is a Permanent Total Enclosure (PeTE) according to 40 CFR 63.3965(a). (EUBALSACORE, EUSKINORRAIL)	a. The direction of the air flow at all times must be into the enclosure; and either b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or c. The pressure drop across the enclosure must be at least 0.007 inch H ₂ O, as established in Method 204 of Appendix M to 40 CFR 51.
Emission capture system that is <u>not</u> a PeTE according to 40 CFR 63.3965(a). (EU197LINE, EUCONTAINERLINE)	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

8. For FGCOATING and EUCLEANUP using the emission rate with add-on controls option, 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:
- All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers. **(40 CFR 63.3893(b)(1))**
 - Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized. **(40 CFR 63.3893(b)(2))**
 - 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. **(40 CFR 63.3893(b)(3))**
 - Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents. **(40 CFR 63.3893(b)(4))**
 - Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment. **(40 CFR 63.3893(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). **(40 CFR 63.3893(c))**
9. For FGCOATING and EUCLEANUP, 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, such as conveyors that move parts among enclosures. **(40 CFR 63.3900(c))**
10. For FGCOATING and EUCLEANUP the permittee is using the emission rate with add-on controls option therefore the permittee shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction. **(40 CFR 63.3900(a)(2)(ii))**
11. For FGCOATING and EUCLEANUP the permittee is using the emission rate with add-on controls option therefore the permittee shall be in compliance with the work practice standards in 40 CFR 63.3893 at all times. **(40 CFR 63.3900(a)(2)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any coating operations in FGCOATING unless the regenerative thermal oxidizer is installed, maintained, and operated in a satisfactory manner.² **(40 CFR 63.3892(b))**

V. TESTING/SAMPLING

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

- For FGCOATING and EUCLEANUP, the permittee shall conduct each performance test required by 40 CFR 63.3960 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.3964(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h). **(40 CFR 63.3964(a))**
- The permittee shall conduct each performance test of FGCOATINGS to determine capture efficiency of the emission capture system and emission destruction efficiency of the RTO, according to the requirements in 40 CFR 63.3965 and 40 CFR 63.3966. **(40 CFR 63.3964(b))**

3. During any performance test of FGCOATING the permittee must monitor and record the combustion temperature on the RTO at least once every 15 minutes during each of the three test runs. The permittee must monitor the temperature in the firebox of the RTO or immediately downstream of the firebox before any substantial heat exchange occurs. Use the data collected during the performance test to calculate the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer. **(40 CFR 63.3967(a))**

See Appendix 5

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, at a minimum, the following records:² **(40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j))**
 - a. A copy of each notification and report that is submitted to comply with Subpart Mmmm, and the documentation supporting each notification and report. **(40 CFR 63.3930(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 and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. **(40 CFR 63.3930(b))**
 - c. A list of the emission units on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.3930(c)(1))**
 - d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941. **(40 CFR 63.3930(c)(2))**
 - e. For EU197LINENOCTRL, EUCONTNRNOCTRL and EUCLEANUP, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951. **(40 CFR 63.3930(c)(3))**
 - f. For FGCOATING and EUCLEANUP the calculations specified in (i) through (v) below. **(40 CFR 63.3930(c)(4))**
 - i. The calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of 40 CFR 63.3951;
 - ii. The calculations of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951;
 - iii. The calculations of the mass of organic HAP emission reduction by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of 40 CFR 63.3961 and Equations 2,3 and 3A of 40 CFR 63.3961 as applicable;
 - iv. The calculation of each month's organic HAP emission rate using Equation 4 of 40 CFR 63.3961 and
 - v. The calculation of each 12-month organic HAP emission rate using Equation 5 of 40 CFR 63.3961.
 - g. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(d))**
 - h. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight. **(40 CFR 63.3930(e))**
 - i. The volume fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.3930(f))**
 - j. For either the emission rate without add-on controls or with add-on controls option, the density of for each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(g))**

- k. The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4). **(40 CFR 63.3930(h))**
- l. The date, time, and duration of each deviation. **(40 CFR 63.3930(j))**
- m. For FGCOATING, the permittee must keep the following records specified in (i) through (viii) below. **(40 CFR 63.3930(k))**
- i. For each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction.
 - ii. The records in 40 CFR 63.5(e)(3)(iii) through (v) related to startup, shutdown and malfunction.
 - iii. The records required to show continuous compliance with each operating limit specified in Table 1 of 40 CFR Part 63, Subpart M.
 - iv. For EUBALSACORE and EUSKINORAIL the data and documentation you used to support a determination that the capture system meets the criteria in Method 204 of appendix M to 40 CFR part 51 for a PeTE and has a capture efficiency of 100 percent as specified in 40 CFR 63.3965(a)
 - v. For EU197LINE and EUCONTAINERLINE the data and documentation used to determine capture efficiency according to the requirements specified in 40 CFR 63.3965 and 63.3965(b).
 - vi. Records for the organic HAP destruction efficiency determination for the RTO as specified in 40 CFR 63.3966. This must include records of each FGCOATING performance test conducted on the RTO according to 40 CFR 63.3964 and 40 CFR 63.3966. These records must also include records of the FGCOATING operating conditions during the performance test showing the performance test was conducted under representative operating conditions.
 - vii. Records of the data and calculations used to establish the emission capture systems and RTO operating limits as specified in 40 CFR 63.3967 and to document compliance with the operating limits as specified in Table 1 of in 40 CFR Part 63, Subpart M.
 - viii. A record of the work practice plan required by 40 CFR 63.3893 and documentation that the permittee is implementing the plan on a continuous basis.
2. For FGCOATING, the permittee shall demonstrate continuous compliance with the operating limits specified below taken from Table 1 of 40 CFR, Part 63, Subpart M.² **(40 CFR 63.3963(c) Table 1 of 40 CFR, Part 63, Subpart M)**
- a. For the RTO, the average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a). To demonstrate this, the permittee shall must do the following:
 - i. Collect the combustion temperature data according to 40 CFR 63.3968(c);
 - ii. Reduce the data to 3-hour block averages; and
 - iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
 - b. For EUBALSACORE and EUSKINORAIL with emission capture systems (enclosures) that are a PeTE according to 40 CFR 63.3965(a), the direction of the air flow at all times must be into the enclosure, and either the average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute, or the pressure drop across the enclosure must be at least 0.007 inch H₂O as established in Method 204 of Appendix M to 40 CFR, Part 51. To demonstrate continuous compliance the permittee shall record the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.3968(g)(1) or the pressure drop across the enclosure according to 40 CFR 63.3968(g)(2); and maintain the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintain the direction of air flow into the enclosure at all times.

- c. For EU197LINE and EUCONTAINERLINE with emission capture systems (enclosures) that are not a PeTE according to 40 CFR 63.3965(a), the average gas volumetric flow rate or duct static pressure in each duct between the enclosures and RTO inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for each enclosure according to 40 CFR 63.3967(f). To demonstrate continuous compliance the permittee shall record the gas volumetric flow rate or duct static pressure for the enclosures according to 40 CFR 63.3968(g), reduce the data to 3-hour block averages, and maintain the 3-hour average gas volumetric flow rate or duct static pressure for each enclosure at or above the gas volumetric flow rate or duct static pressure limit.
3. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.3890, for each compliance period, using Equation 2 of 40 CFR 63.3941. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.3941(a).² **(40 CFR 63.3942)**
4. For EU197LINENOCTRL, EUCONTNRNOCTRL and EUCLEANUP using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890 for each 12-month rolling time period according to 40 CFR 63.3951(a) through (g).² **(40 CFR 63.3952)**
5. For FGCOATING and EUCLEANUP using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890 for each 12-month rolling time period according to the procedures in 40 CFR 63.3961.² **(40 CFR 63.3963)**
6. During any testing required by 40 CFR 63.3960, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.3967 to establish the operating limits for each enclosure and the RTO required by 40 CFR 63.3892.² **(40 CFR 63.3967)**
7. For FGCOATING and EUCLEANUP using the emission rate with add-on controls option, the permittee shall install, operate, and maintain the temperature monitoring system for the thermal oxidizer, the differential pressure monitoring systems for the capture systems or duct volumetric flow rate monitoring systems or duct static pressure monitoring systems according to the requirements of 40 CFR 63.3968(a). **(40 CFR 63.3968)**
8. EU197LINE and EUCONTAINERLINE enclosures contain a bypass line. These bypass lines shall only be used when these emission units are operating as EU197LINENOCTRL and EUCONTNRNOCTRL. During all other times, the permittee shall comply with the requirements of 40 CFR 63.3968(b).² **(40 CFR 63.3968)**

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. For EU197LINENOCTRL, EUCONTNRNOCTRL, and EUCLEANUP when using the compliant material option, if any coating used for any 12-month compliance period exceeds the 2.6 pounds of Organic HAP per gallon of coating solids used; or any thinner or cleaning material used contains any organic HAP, the permittee shall report this as a deviation [as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(5)] **(40 CFR 63.3942(b))**
5. For EU197LINENOCTRL, EUCONTNRNOCTRL and EUCLEANUP when using the emission rate without add-on controls, if the organic HAP emission rate for any 12-month compliance period exceeds the limit of 2.6

pounds of organic HAP per gallon of coating solids used, the permittee shall report this as a deviation [as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(6)]. **(40 CFR 63.3952(b))**

6. For FGCOATING and EUCLEANUP the permittee shall report the following as deviations [as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7)]: **(40 CFR 63.3963(b)through (e))**
 - a. The organic HAP emission rate for any 12-month compliance period exceeding the applicable emission limit of 2.6 pounds of organic HAP per gallon of coating solids used,
 - b. An operating parameter that is out of the allowed range;
 - c. Any control system by-pass line that is opened during coating operations of EU197LINE or EUCONTAINERLINE;
 - d. Deviations from work practice standards.

7. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a) and semiannual reporting of monitoring and deviations. These reports 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. This semiannual compliance and deviation report may be submitted in conjunction with the ROP deviation reporting. This report must include the following: **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c),40 CFR 63.3963(f))**
 - a. Each semiannual compliance report shall identify which emission unit used which compliance option during the reporting period and if compliance options were switched during the reporting period, the beginning and ending dates for each option used must be reported.
 - b. If the emission rate without add-on control or the emission rate with add-on controls options were used, include the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
 - c. If there were no deviations from the emission limit of 2.6 pounds of organic HAP per gallon of coating solids used, include a statement that the coating operations were in compliance. Note that each of the 6 months in the reporting period will be based on the past 12 months of data prior to the date of each monthly calculation.
 - d. If there were deviations, report the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit in I.1. Include the calculations used to determine the 12-month organic HAP emission rate for each compliance period in which a deviation occurred.
 - e. For FGCOATING and EUCLEANUP, if there was a deviation from an emission limitation, the semiannual compliance report must contain the information in 40 CFR 63.3920(a)(7)(i) through (xiv). This includes periods of startup, shutdown, and malfunction during which the deviations occurred.

8. For FGCOATING and EUCLEANUP using the emission rate with add-on controls option, the permittee shall submit all performance test reports no later than 60 days after completing the tests as specified in 40CFR 63.10(d)(2). **(40 CFR 63.3920(b))**
9. For FGCOATING and EUCLEANUP if a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified in the following: **(40 CFR 63.3920(c), 40 CFR 63.10(d))**
 - a. If actions were consistent with the startup, shutdown, and malfunction plan, the information specified in 40 CFR 63.10(d) must be included in the semiannual compliance report.

- b. If actions were not consistent with the startup shutdown, malfunction plan, an immediate startup, shutdown and malfunction report must be submitted as described below:
 - i. Describe the actions taken during the event in a report delivered by facsimile, telephone, or other means to the AQD within 2 working days after starting actions that are inconsistent with the plan.
 - ii. Submit a letter to the AQD within 7 working days after the end of the event, unless alternative arrangements have been made with the AQD. The letter must contain the information specified in 40 CFR 63.10(d)(5)(ii).

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

1. 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 M for Surface Coating of Miscellaneous Metal Parts and Products. **(40 CFR Part 63, Subparts A and M)**

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).

**FGPARTICULATES
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION Router and saw with a cyclone and one horizontal band saw, one vertical band saw, one straight-line rip saw, one trim saw, one belt sander and a baghouse. Also, the wood chip/dust (particulates) emissions from EUBALSACORE CNC router will be directed to existing wood baghouse.

Emission Units: EULMS, EUWOODROOM, EUBALSACORE

POLLUTION CONTROL EQUIPMENT One baghouse and one cyclone collector

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate matter	0.10 pounds per 1,000 pounds of exhaust gases*		Each baghouse/cyclone exhaust of FGPARTICULATES	Conditions V.1 and VI.1	R 336.1331(1)(a)
2. PM-10	0.6 Pounds Per Hour ²		EULMS (Cyclone)	Conditions V.1 and VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 Subparts (c) & (d)
3. PM-10	6.3 Pounds Per Hour ²		EUWOODROOM/ EUBALSACORE (Baghouse)	Conditions V.1 and VI.1	R 336.2803, R 336.2804, 40 CFR 52.21 Subparts (c) & (d)

* Calculated on a dry gas basis.

II. MATERIAL LIMIT(S)

1. NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUBALSACORE or EUWOODROOM unless the baghouse is installed and operating properly. (R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
2. The permittee shall not operate EULMS unless the cyclone is installed and operating properly. (R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
3. The permittee shall operate EUBALSACORE or EUWOODROOM so the differential pressure for the baghouse is within the range contained in the malfunction abatement plan. (R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))
4. The permittee shall operate EULMS so the differential pressure for the cyclone is within the range contained in the malfunction abatement plan. (R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain the baghouse and cyclone each with a differential pressure gauge. **(R 336.1910)**

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 perform and document non-certified visible emissions readings on a weekly basis, when the equipment is operating, and record the following information: **(R 336.1213(3)(a), (R 336.1301, R 336.1910, R 336.2810, 40 CFR 52.21(j))**
 - a. The color of the emissions.
 - b. Whether the visible emissions are representative of normal operations.
 - c. If not normal, the cause of the abnormal emissions.
 - d. The duration of the abnormal emissions.
 - e. The corrective actions taken to resolve the abnormal emissions.

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the differential pressure across the baghouse and cyclone on a daily basis, whenever the equipment is operating. **(R 336.1213(3)(b))**

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. SVCOMPOSITES (Cyclone)	8.0 ²	7.3 ²	R 336.1331, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain a malfunction abatement and preventative maintenance plan for FGPARTICULATES, as approved by the Air Quality Division. The permittee shall review and update the plan annually and following a malfunction incident. The permittee shall submit any updates to the Air Quality Division for approval. **(R 336.1911, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**
2. The compliant differential pressure ranges across the baghouse and the cyclone shall be included in the Air Quality Division approved Malfunction Abatement Plan. These compliant differential pressure ranges shall be determined by manufacturer's specifications, or other methods as approved by the District Supervisor. **(R 336.1910, R 336.1911(2)(b), R 336.1331)**
3. The exhaust gases from the bag house of EUBALSACORE or EUWOODROOM shall not be discharged to the ambient air at any time. **(R 336.1331, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

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).

FGRULE 287(c)
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 287(c).

Emission Unit:

POLLUTION CONTROL EQUIPMENT

I. EMISSION LIMIT(S)

1. NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 gallons	Per month, as applied, minus water, per emission unit	NA	R 336.1287(c)(i)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Any exhaust system that serves only coating spray equipment shall be equipped with a properly installed and operating particulate control system. (R 336.1287(c)(ii))

V. TESTING/SAMPLING

1. 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 DNRE, AQD Rule 287(c), Permit to Install Exemption Record form (EQP 3562) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
 - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(c)(iii))**
 - b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. **(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)

1. NA

IX. OTHER REQUIREMENT(S)

1. NA

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:

POLLUTION CONTROL EQUIPMENT

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)

1. 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)

1. NA

V. TESTING/SAMPLING

1. 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 DNRE, 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)

1. NA

IX. OTHER REQUIREMENT(S)

1. NA

E. NON-APPLICABLE REQUIREMENTS

At the time of 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	Michigan Department of Natural Resources and Environment	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
MDNRE	Michigan Department of Natural Resources and Environment	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

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

Appendix 4. Recordkeeping

Specific Recordkeeping requirement 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 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-B4197-205a **this includes any PTI that were incorporated into the Source-Wide PTI No MI-PTI-B4197-205a 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)
163-07	This permit ties an existing emission unit EUFORKTUBES into the existing RTO for emission control. EUFORKTUBES was operated as exempt and was part of FGMISCADHESIVES on the ROP MI-ROP-B4197-2005. All coating processes which are subject to 40 CFR, Part 63, Subpart MMMM.	EUFORKTUBES FGCOATINGS FGMACT
4-09	The permit is to remove two existing coating lines (EUADHESIVES & EUFORKTUBES) and replace them with one, new line (EUSKINORRAIL). The permit does not change any existing emission limits as a result of this change. The change will not alter the current usage or emissions. EUSKINORRAIL consists of an entrance conveyor, a glue spray booth, a transfer conveyor, an infrared drying oven, a cooling booth and an unloading unit.	EUSKINORRAIL FGCOATINGS FGMACT
167-07B	This permit was requested to specifically address the addition of the new p-chlorobenzotrifluoride (CAS #98-56-6) PCBTF-containing coatings to make needed changes to the previous permit emission limits and to air toxic limits and restrictions needed to properly regulate these coatings. The potential formation of dioxins/and furans by running PCBTF through the RTO required that the PCBTF not be allowed to go to the RTO.	EU197LINENOCNTRL EUCONTAINERNOCNTRL FGCOATINGS FGMACT

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
	Restrictions were placed on operating EU197LINENOCNTRL and EUCONTAINERNOCNTRL simultaneously.	
167-07C	AAR is proposing changes to the existing permit to move two emission units (EU197LINENOCNTRL and EUCONTNRNOCTRL) out of flexible group FGCOATINGS for PTI 163-07B. Takes EUCLEANUP out of FGCOATING. The permit review was also intended to clear up differences between Permits 4-09 and 163-07B on the FGCOATINGS Special Conditions. It was recently found that these two permits are both still active and have different versions of FGCOATINGS.	EU197LINENOCNTRL EUCONTAINERNOCNTRL EUCLEANUP FGCOATINGS FGMACT

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 EUCONTNRNOCTRL, EUCLEANUP, FGCOATINGS, and EUAIRSTRIPPER.

1. EUCONTNRNOCTRL, EU197LINENOCNTROL and EUGRIND/PAINT

A. Pounds of VOC per hour calculated daily

$$\frac{\text{Pounds VOC}}{\text{hour}} = \sum_{i=1}^n \left(\frac{VX}{T} \right)_i$$

Where: V = Volume of coating "i" (minus water) as applied during the calendar day.
 X = Pounds of VOC per gallon of coating "i" (minus water) as applied during the calendar day.
 T = Hours of operation per calendar day.

B. Tons per year, based on a 12-month rolling time period calculated monthly

$$\frac{\text{Tons VOC}}{\text{12 month time period}} = \sum_{j=1}^{12} \left(\sum_{i=1}^n \left(\frac{VX}{T} \right)_i \right)_j \times \frac{\text{hours of operation}}{\text{12 month time period}} \times \frac{1 \text{ ton}}{2,000 \text{ pounds}}$$

Where: V = Volume of coating "i" (minus water) as applied during each 12 month time period.
 X = Pounds of VOC per gallon of coating "i" (minus water) as applied during each 12 month time period.
 T = Hours of operation per averaging period.

2. FGCOATINGS

A. Pounds of VOC per hour calculated daily

$$\frac{\text{Pounds VOC}}{\text{hour}} = \left(\sum_{i=1}^n \left(\frac{VX}{T} \right)_i \right) + \left(\sum_{i=1}^n \left(\frac{(S_U - S_R)X}{T} \right)_i \times [1 - (CE \times DE)] \right) + \left(\sum_{i=1}^n \left(\frac{CX}{T} \right)_i \times [1 - (CE \times DE)] \right)$$

Where: V = Volume of coating "i" (minus water) as applied during each calendar day.
 X = Pounds of VOC per gallon of coating "i" (minus water) as applied during each calendar day.
 T = Hours of operation per each calendar day.
 S_U = Volume of cleanup solvent used during each calendar day.
 S_R = Volume of cleanup solvent reclaimed during each calendar day.
 C = Pounds of VOC per gallon of coating/reducer as received.
 CE = Capture efficiency of the paint booth, based upon the most recent capture efficiency testing.
 DE = Destruction efficiency of the RTO.

B. Tons per year, based on a 12-month rolling time period calculated monthly

$$\frac{\text{Tons VOC}}{\text{12 month time period}} = \sum_{j=1}^{12} \left[\left(\sum_{i=1}^n \left(\frac{VX}{T} \right)_i \right) + \left(\sum_{i=1}^n \left(\frac{(S_U - S_R)X}{T} \right)_i \times [1 - (CE \times DE)] \right) + \left(\sum_{i=1}^n \left(\frac{CX}{T} \right)_i \times [1 - (CE \times DE)] \right) \right]$$

Where: V = Volume of coating "i" (minus water) as applied during each 12 month time period.
 X = Pounds of VOC per gallon of coating "i" (minus water) as applied during each 12 month time period.
 T = Hours of operation per each 12 month time period.
 CE = Capture efficiency of the paint booth, based upon the most recent capture efficiency testing.
 DE = Destruction efficiency of the RTO.
 S_U = Volume of cleanup solvent used during the averaging period.
 S_R = Volume of cleanup solvent reclaimed during the averaging period.
 C = Pounds of VOC per gallon of coating/reducer as received.

3. EUCLEANUP

A. Pounds of VOC per hour calculated monthly

$$\frac{\text{Pounds VOC}}{\text{hour}} = \sum_{i=1}^n \left(\frac{(S_U - S_R)X}{T} \right)_i \times [1 - (CE \times DE)]$$

Where: S_U = Volume of cleanup solvent used during each month.
 S_R = Volume of cleanup solvent reclaimed during each month.
 T = Hours of operation each month.
 CE = Capture efficiency of the paint booth, based upon the most recent capture efficiency testing.
 DE = Destruction efficiency of the RTO.
 X = Pounds of VOC per gallon of cleanup solvent "i".

B. Tons per year, based on a 12-month rolling time period calculated monthly

$$\frac{\text{Tons VOC}}{\text{12 month time period}} = \sum_{j=1}^{12} \left(\sum_{i=1}^n \left(\frac{(S_U - S_R)X}{T} \right)_i \right)_j \times \frac{\text{hours of operation}}{\text{12 month time period}} \times \frac{1 \text{ ton}}{2,000 \text{ pounds}} \times [1 - (CE \times DE)]$$

Where: S_U = Volume of cleanup solvent used during each 12 month time period.
 S_R = Volume of cleanup solvent reclaimed during each 12 month time period.
 T = Hours of operation per each 12 month time period.
 CE = Capture efficiency of the paint booth, based upon the most recent capture efficiency testing.
 DE = Destruction efficiency of the RTO.
 X = Pounds of VOC per gallon of cleanup solvent "i".

4. EUAIRSTRIPPER

A. Dichloroethane, 1,1,2,2 Tetrachloroethylene, Trichloroethylene; in mg/m³, corrected to 70°F and 29.92 inches Hg.

$$\text{Pollutant emissions} \left(\frac{\text{mg}}{\text{m}^3} \right) = (C_I - C_E) \times \frac{\text{mg}}{1,000 \mu\text{g}} \times \frac{1,000 \text{ L}}{\text{m}^3} \times \frac{1 \text{ L H}_2\text{O}}{69.7 \text{ L air}} \times .987$$

Where: C_I = Pollutant influent concentration, in $\mu\text{g/L}$, in water to the air stripper.
 C_E = Pollutant effluent concentration, in $\mu\text{g/L}$, in water from the air stripper.

B. Total VOC, pounds per hour.

$$\text{Total VOC} \left(\frac{\text{pounds}}{\text{hour}} \right) = (\text{VOC}_I - \text{VOC}_E) \times \frac{1 \text{ g}}{10^6 \mu\text{g}} \times \frac{1 \text{ lb.}}{453.59 \text{ g}} \times \frac{1 \text{ L H}_2\text{O}}{69.7 \text{ L air}} \times \frac{28.32 \text{ L}}{\text{ft}^3} \times Q \times \frac{60 \text{ min.}}{1 \text{ hour}}$$

Where: VOC_I = VOC influent concentration, in $\mu\text{g/L}$, in water to the air stripper.
 VOC_E = VOC effluent concentration, in $\mu\text{g/L}$, in water from the air stripper.
 Q = Water flow rate, in ft^3/min .

Appendix 8. Reporting

1. Annual, Semiannual, and Deviation Certification Reporting

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

2. 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.