

**Archived:** Thursday, January 21, 2021 5:07:09 PM

**From:** [Ron C Zibbell](#)

**Sent:** Fri, 8 Jan 2021 20:19:48 +0000ARC

**To:**

**Cc:** [Michael J Soltes](#) [Warren M Shunk](#)

**Subject:** B7711 - ROP Renewal Application

**Sensitivity:** High

**Attachments:**

[Holland ROP Renewal Application 2020.docx](#) [Holland ROP Renewal Application 2020.pdf](#) [Holland B7711 Final ROP 07-26-16.docx](#)

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**\cbpat2CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

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Attached please find the ROP renewal application and ROP for the Sherwin-Williams Holland, MI aerosol facility. Original signed copies will follow in the mail.

Please let us know if there are any questions.

Thanks.

***Ron Zibbell Jr***

EHS Manager

The Sherwin-Williams Company

636 E. 40<sup>th</sup> Street, Holland, MI 49423

Phone: (616) 392-7811 ext. 226

Cell: (616) 268-8842



<https://badge.bcsp.org/?e=MzlwMDg3fDY2MzE2N3wxMDAxODc3NjUz>



## RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.*

### GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V”, then “ROP Forms & Templates”).

### PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

#### SOURCE INFORMATION

SRN B7711	SIC Code 2851	NAICS Code 325510	Existing ROP Number MI-ROP-B7711-2016	Section Number (if applicable)
Source Name Sherwin-Williams Company				
Street Address 636 East 40th Street				
City Holland	State MI	ZIP Code 49423	County Allegan	
Section/Town/Range (if address not available)				
Source Description Aerosol paint packaging facility				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

#### OWNER INFORMATION

Owner Name Sherwin-Williams Company	Section Number (if applicable)			
Mailing address ( <input type="checkbox"/> check if same as source address) 101 Prospect Ave.				
City Cleveland	State OH	ZIP Code 44115	County Cuyahoga	Country USA

Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

SRN: B7711	Section Number (if applicable):
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**PART A: GENERAL INFORMATION (continued)**

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

**CONTACT INFORMATION**

Contact 1 Name Ron Zibbell		Title EHS Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 616-392-7811 ext 226		E-mail address <a href="mailto:ronald.c.zibbell@sherwin.com">ronald.c.zibbell@sherwin.com</a>		

Contact 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

**RESPONSIBLE OFFICIAL INFORMATION**

Responsible Official 1 Name Warren Shunk		Title Plant Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 616-392-7811 ext 222		E-mail address Warren.m.shunk@sherwin.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:
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**PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official**

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

<b>Listing of ROP Application Contents. Check the box for the items included with your application.</b>	
<input checked="" type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	<input type="checkbox"/> Compliance Plan/Schedule of Compliance
<input checked="" type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required)	<input type="checkbox"/> Stack information
<input type="checkbox"/> Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	<input type="checkbox"/> Acid Rain Permit Initial/Renewal Application
<input type="checkbox"/> Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Confidential Information
<input type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	<input checked="" type="checkbox"/> Paper copy of all documentation provided (required)
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input checked="" type="checkbox"/> Electronic documents provided (optional)
<input type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input type="checkbox"/> Other, explain:

<b>Compliance Statement</b>	
This source is in compliance with <b>all</b> of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.	
If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.	

<b>Name and Title of the Responsible Official (Print or Type)</b>	
Warren Shunk – Plant Manager	
<i><b>As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.</b></i>	
_____	_____
<b>Signature of Responsible Official</b>	<b>Date</b>

**PART C: SOURCE REQUIREMENT INFORMATION**

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from <b>all</b> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <b>not</b> been reported in MAERS for the most recent emissions reporting year? If <b>Yes</b> , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If <b>Yes</b> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C4.	Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , VOC, lead) emissions? If <b>Yes</b> , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If <b>No</b> , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5.	Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If <b>Yes</b> , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <b>must</b> be included in HAP emission calculations. If <b>No</b> , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <b>Yes</b> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7.	Are any emission units subject to the federal Acid Rain Program? If <b>Yes</b> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <b>Yes</b> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If <b>Yes</b> , then a copy must be submitted as part of the ROP renewal application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If <b>Yes</b> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/>	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: <b>AI-</b>	



**PART E: EXISTING ROP INFORMATION**

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to all emission units and all applicable requirements in the existing ROP.

<p>E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If <u>Yes</u>, identify changes and additions on Part F, Part G and/or Part H.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>E2. For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u>, identify the stack(s) that was/were not reported on applicable MAERS form(s).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If <u>Yes</u>, complete Part F with the appropriate information.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u>, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Comments: EU-LINE-04-LIQ dismantled.</p>	
<p><input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: <b>AI-</b></p>	

**PART F: PERMIT TO INSTALL (PTI) INFORMATION**

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table.  Yes  No  
 If No, go to Part G.

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP.  Yes  No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP.  Yes  No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identify the stack(s) that were not reported on the applicable MAERS form(s).  Yes  No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form.  Yes  No

Comments:

Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**



**PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290**

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.  
 If Yes, identify the emission units in the table below. If No, go to Part H.  Yes  No  
*Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.*

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input type="checkbox"/> Rule 287(2)(c) surface coating line		
<input checked="" type="checkbox"/> Rule 290 process with limited emissions	Line 1 aerosol can cleaning station using acetone Line 6 aerosol can cleaning station using acetone Line 9 aerosol can cleaning station using acetone Line 10 aerosol can cleaning station using acetone	1/31/07, 1/31/07, 12/8/86, 12/8/86

Comments:

Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: **AI-**

**PART H: REQUIREMENTS FOR ADDITION OR CHANGE**

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H6. Does the source propose to add, change and/or delete <b>source-wide</b> requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H7. Are you proposing to <b>streamline</b> any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)**

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

**PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)**

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-0001**



## RENEWABLE OPERATING PERMIT APPLICATION

### AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B7711	Section Number (if applicable):
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1. Additional Information ID <b>AI-0001</b>
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<b>Additional Information</b>
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2. Is This Information Confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Reciprocating internal combustion (IC) engine (existing emergency electrical generating reciprocating internal combustion engine at an area source of HAPS). One 350 hp existing emergency fire pump compression engine, installed 1992 using diesel fuel.

Subject to 40 CFR Part 63 Subpart ZZZZ  
 40 CFR Subpart ZZZZ §63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

40 CFR Part 63 Subpart ZZZZ Table 2d.4

4. Emergency stationary CI RICE and black start stationary CI RICE. <sup>2</sup>	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>1</sup>
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

EFFECTIVE DATE: July 26, 2016

ISSUED TO

**Sherwin-Williams Company**

State Registration Number (SRN): B7711

LOCATED AT

636 East 40th Street, Holland, Michigan 49423

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B7711-2016

Expiration Date: July 26, 2021

Administratively Complete ROP Renewal Application Due Between January 26, 2020 and  
January 26, 2021

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-B7711-2016

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

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Mary A. Douglas, Kalamazoo District Supervisor

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rop Renewal APP



## RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.*

### GENERAL INSTRUCTIONS

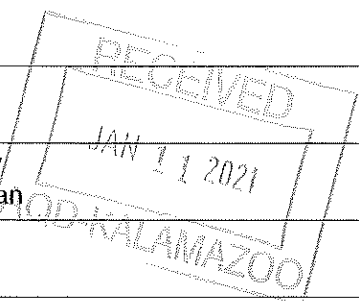
This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

### PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

#### SOURCE INFORMATION

SRN B7711	SIC Code 2851	NAICS Code 325510	Existing ROP Number MI-ROP-B7711-2016	Section Number (if applicable)
Source Name Sherwin-Williams Company				
Street Address 636 East 40th Street				
City Holland		State MI	ZIP Code 49423	County Allegan
Section/Town/Range (if address not available)				
Source Description Aerosol paint packaging facility				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				



#### OWNER INFORMATION

Owner Name Sherwin-Williams Company				Section Number (if applicable)
Mailing address ( <input type="checkbox"/> check if same as source address) 101 Prospect Ave.				
City Cleveland		State OH	ZIP Code 44115	County Cuyahoga
				Country USA

Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

**PART A: GENERAL INFORMATION (continued)**

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

**CONTACT INFORMATION**

Contact 1 Name Ron Zibbell		Title EHS Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 616-392-7811 ext 226		E-mail address ronald.c.zibbell@sherwin.com		

Contact 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

**RESPONSIBLE OFFICIAL INFORMATION**

Responsible Official 1 Name Warren Shunk		Title Plant Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 616-392-7811 ext 222		E-mail address Warren.m.shunk@sherwin.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:
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**PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official**

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

**Listing of ROP Application Contents. Check the box for the items included with your application.**

<input checked="" type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	<input type="checkbox"/> Compliance Plan/Schedule of Compliance
<input checked="" type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required)	<input type="checkbox"/> Stack information
<input type="checkbox"/> Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	<input type="checkbox"/> Acid Rain Permit Initial/Renewal Application
<input type="checkbox"/> Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Confidential Information
<input type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	<input checked="" type="checkbox"/> Paper copy of all documentation provided (required)
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input checked="" type="checkbox"/> Electronic documents provided (optional)
<input type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input type="checkbox"/> Other, explain:

**Compliance Statement**

This source is in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.  Yes  No

This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.  Yes  No

This source will meet in a timely manner applicable requirements that become effective during the permit term.  Yes  No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

**Name and Title of the Responsible Official (Print or Type)**

Warren Shunk – Plant Manager

*As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.*



Signature of Responsible Official

Date

11/7/2021

**PART C: SOURCE REQUIREMENT INFORMATION**

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from <u>all</u> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <u>not</u> been reported in MAERS for the most recent emissions reporting year? If <u>Yes</u> , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If <u>Yes</u> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C4.	Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO2, VOC, lead) emissions? If <u>Yes</u> , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If <u>No</u> , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5.	Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If <u>Yes</u> , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <u>must</u> be included in HAP emission calculations. If <u>No</u> , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <u>Yes</u> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7.	Are any emission units subject to the federal Acid Rain Program? If <u>Yes</u> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <u>Yes</u> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If <u>Yes</u> , then a copy must be submitted as part of the ROP renewal application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If <u>Yes</u> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/>	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-	

**PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION**

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below.  Yes  No

If No, go to Part E.

*Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).*

Emission Unit ID	Emission Unit Description	Rule 212(4) Citation [e.g. Rule 212(4)(c)]	Rule 201 Exemption Rule Citation [e.g. Rule 282(2)(b)(i)]
DV-Boiler	3 natural gas fired boilers. All boilers are less than 4.2 million btu/hr.	Rule 212(4)(c)	Rule 282(2)(b)(i)
DV-Furnace	7 natural gas heaters. All heaters are less than 6.5 million btu/hr.	Rule 212(4)(c)	Rule 282(2)(b)(i)
DV-LPG Tanks	17 LPG propellant storage tanks. All LPG tanks are less than 18,400 gallons.	Rule 212(4)(d)	Rule 284(2)(b)

Comments:

Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: AI-

**PART E: EXISTING ROP INFORMATION**

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to all emission units and all applicable requirements in the existing ROP.

<p>E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If <u>Yes</u>, identify changes and additions on Part F, Part G and/or Part H.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>E2. For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u>, identify the stack(s) that was/were not reported on applicable MAERS form(s).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If <u>Yes</u>, complete Part F with the appropriate information.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u>, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Comments: EU-LINE-04-LIQ dismantled.</p>	
<p><input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: AI-</p>	





**PART H: REQUIREMENTS FOR ADDITION OR CHANGE**

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H6. Does the source propose to add, change and/or delete <b>source-wide</b> requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H7. Are you proposing to <b>streamline</b> any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)**

<p>H8. Does the source propose to add, change and/or delete <b>emission limit</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H9. Does the source propose to add, change and/or delete <b>material limit</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H10. Does the source propose to add, change and/or delete <b>process/operational restriction</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H11. Does the source propose to add, change and/or delete <b>design/equipment parameter</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H12. Does the source propose to add, change and/or delete <b>testing/sampling</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H13. Does the source propose to add, change and/or delete <b>monitoring/recordkeeping</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H14. Does the source propose to add, change and/or delete <b>reporting</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



**PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)**

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: AI-0001



## RENEWABLE OPERATING PERMIT APPLICATION

### AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B7711	Section Number (if applicable):
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1. Additional Information ID <b>AI-0001</b>
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<b>Additional Information</b>
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2. Is This Information Confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Reciprocating internal combustion (IC) engine (existing emergency electrical generating reciprocating internal combustion engine at an area source of HAPS). One 350 hp existing emergency fire pump compression engine, installed 1992 using diesel fuel.

Subject to 40 CFR Part 63 Subpart ZZZZ  
40 CFR Subpart ZZZZ §63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

40 CFR Part 63 Subpart ZZZZ Table 2d.4

4. Emergency stationary CI RICE and black start stationary CI RICE. <sup>2</sup>	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>1</sup>
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

EFFECTIVE DATE: July 26, 2016

ISSUED TO

**Sherwin-Williams Company**

State Registration Number (SRN): B7711

LOCATED AT

636 East 40th Street, Holland, Michigan 49423



**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B7711-2016

Expiration Date: July 26, 2021

Administratively Complete ROP Renewal Application Due Between January 26, 2020 and  
January 26, 2021

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-B7711-2016

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

Mary A. Douglas, Kalamazoo District Supervisor

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Expiration Date: July 26, 2021  
PTI No: MI-PTI-B7711-2016

## AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

## A. GENERAL CONDITIONS

### Permit Enforceability

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

### General Provisions

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

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Expiration Date: July 26, 2021  
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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).<sup>2</sup> (R 336.1370)
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R 336.1910)

#### Emission Limits

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

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

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<sup>1</sup> (R 336.1901(a))
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> (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).<sup>2</sup> (R 336.2001)
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(5))

ROP No: MI-ROP-B7711-2016  
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### Monitoring/Recordkeeping

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

### Certification & Reporting

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



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

#### Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied (R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii)):
- The applicable requirements are included and are specifically identified in the ROP.
  - The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. (R 336.1213(6)(b)(i))
  - The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. (R 336.1213(6)(b)(ii))
  - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. (R 336.1213(6)(b)(iii))

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

#### Revisions

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

#### Reopenings

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

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#### Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. (R 336.1210(8))

#### Stratospheric Ozone Protection

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

#### Risk Management Plan

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

#### Emission Trading

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

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**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.<sup>2</sup> (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.<sup>2</sup> (R 336.1201(8), Section 5510 of Act 451)
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.<sup>2</sup> (R 336.1219)
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> (R 336.1201(4))

**Footnotes:**

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

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

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## B. SOURCE-WIDE CONDITIONS

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

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

**SOURCE-WIDE CONDITIONS**

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9 tpy. <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month.	Stationary Source	SC VI.1	R 336.1205(3)
2. Aggregate HAPs	Less than 22 tpy for any combination. <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month.	Stationary Source	SC VI.1	R 336.1205(3)

**II. MATERIAL LIMIT(S)**

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

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

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 calculate and record the stationary source-wide emission rates, in tons, for each individual HAP and total combined HAPs for each calendar month and each 12-month rolling time period as determined at the end of each calendar month. (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))

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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 B

**VIII. STACK/VENT RESTRICTION(S)**

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

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

### C. EMISSION UNIT CONDITIONS

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

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

#### EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-TANKS-STORAGE	Twenty-eight (28) carbon steel outside solvent storage tanks. Includes tank Nos. 28-55.	01-30-86/ 02-04-97	NA
EU-LINE-01-VJ	Line 1 Video Jet can coder.	08-01-93	FG-RULE-290
EU-LINE-06-VJ	Line 6 Video Jet can coder.	06-01-92	FG-RULE-290
EU-LINE-09-VJ	Line 9 Video Jet can coder.	01-21-87	FG-RULE-290
EU-LINE-10-VJ	Line 10 Video Jet can coder.	01-21-87	FG-RULE-290
EU-LINE-01-MARSH	Line 1 Marsh carton printing unit.	06-01-98	FG-RULE-290
EU-LINE-06-MARSH	Line 6 Marsh carton marking equipment.	06-01-92	FG-RULE-290
EU-LINE-09-MARSH	Line 9 Marsh carton marking equipment.	01-21-87	FG-RULE-290
EU-LINE-10-MARSH	Line 10 Marsh carton marking equipment.	01-21-87	FG-RULE-290
EU-LINE-01-CLEAN	Line 1 can cleaning station	01-31-07	FG-RULE-290
EU-LINE-06-CLEAN	Line 6 can cleaning station	01-31-07	FG-RULE-290
EU-LINE-09-CLEAN	Line 9 can cleaning station	12-08-86	FG-RULE-290
EU-LINE-10-CLEAN	Line 10 can cleaning station	12-08-86	FG-RULE-290
EU-LINE-01-AERO	Aerosol can production Line #1. This line fills cans up to 24 oz capacity with liquid paint or other chemical product. Then gas propellant is added using a "through the valve" pressure filler located in the 1/6 gashouse.	11-01-68/ 09-30-08	FG-MIX-FILL-CHRG FG-40CFRPART59 FG-40CFRSUBPARTCC CCCCC
EU-LINE-06-AERO	Aerosol can production Line #6. This line fills cans up to 24 oz capacity with liquid paint or other chemical product. Then gas propellant is added using a "through the valve" pressure filler located in the 1/6 gashouse.	07-01-75/ 12-01-99	FG-MIX-FILL-CHRG FG-40CFRPART59 FG-40CFRSUBPARTCC CCCCC
EU-LINE-09-AERO	Aerosol can production Line #9. This line fills cans up to 16 oz capacity with liquid paint or other chemical product. Then gas propellant is added using a "through the valve" pressure filler located in the 9/10 gashouse.	12-08-86/ 09-30-08	FG-MIX-FILL-CHRG FG-40CFRPART59 FG-40CFRSUBPARTCC CCCCC

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-LINE-10-AERO	Aerosol can production Line #10. Includes liquid product and gas propellant filling.	12-08-86/ 07-01-03	FG-MIX-FILL-CHRG FG-40CFRPART59 FG- 40CFRSUBPARTCC CCCC
EU-MIXING	Various mixing and blending tanks used to formulate the liquid portion of the products filled on the lines.	11-01-68	FG-MIX-FILL-CHRG FG-40CFRPART59 FG- 40CFRSUBPARTCC CCCC
<del>EU-LINE-04-LIQ</del>	<del>Liquid bottles of various sizes are filled with cleaners and other chemical products.</del>	<del>11-01-87</del>	<del>FG-MIX-FILL-CHRG FG-40CFRPART59 FG- 40CFRSUBPARTCC CCCC</del>
<del>EU-EM-ENGINE</del>	<del>Emergency fire pump compression engine.</del>	<del>1-31-92</del>	<del>FG- 40CFR63SUBPARTZ ZZZ</del>

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**EU-TANKS-STORAGE  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Twenty-eight (28) carbon steel outside solvent storage tanks. Includes tank Nos. 28-55.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	41.4 pounds per hour. <sup>2</sup>	Calculated on a monthly basis.	EU-TANKS-STORAGE	SC VI.5	R 336.1702(a)
2. VOC	10.5 tons per year. <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month.	EU-TANKS-STORAGE	SC VI.4	R 336.1702(a)
3. Methyl isobutyl ketone	47,000 mg/m <sup>3</sup> corrected to 70°F and 29.92 inches Hg. <sup>1</sup>	Calculated on a calendar yearly basis.	EU-TANKS-STORAGE	SC VI.3	<del>R 336.1225</del>

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**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Solvent	The permittee shall not load more than 9,300,000 gallons of solvent into the tank farm per year. <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	EU-TANKS-STORAGE	SC VI.2	R 336.1702(a)
2. Solvent	For each tank in the tank farm the amount of solvent loaded per year shall not exceed 275 times the capacity of the tank. <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	EU-TANKS-STORAGE	SC VI.2	R 336.1702(a)

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. Tanks 30 and 31 (25,000 gallons each) shall not be filled with a material with a vapor pressure  $\geq$  15 kilopascals (112.5 mm of mercury). (R336.1213(3))
2. The permittee shall not load any one compound into 2 or more tanks simultaneously, nor shall the permittee load different compounds into more than 2 tanks at once.<sup>2</sup> (R 336.1702(a))
3. The loading rate of any compound into any tank in the tank farm shall not exceed 110 gallons per minute.<sup>2</sup> (R 336.1702(a))

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate the tank farm unless the conservation vents are installed and operating properly. Proper operation includes maintaining minimum settings of 0.25 pounds per square inch above and below atmospheric pressure.<sup>2</sup> (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))

NA

**VI. MONITORING/RECORDKEEPING**

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

1. A record shall be kept showing the dimensions and an analysis of the capacity for tanks 30 and 31, and tanks 53, 54, and 55 (19,500 gallons each). (40 CFR 60.116b(b))
2. A monthly record of the composition and amount of liquid loaded into each of the tanks in the tank farm shall be kept.<sup>2</sup> (R 336.1201(3))
3. ~~The permittee shall calculate the emissions of methyl isobutyl ketone from the tank farm on a yearly basis. Emission calculations shall be based on AP-42 working and breathing loss equations. (R 336.1213(3))~~
4. The permittee shall calculate on a monthly basis the VOC and HAP emission rates, determining a monthly emission rate in tons per month and a 12-month rolling time period emission rate in tons per year. Emission calculations shall be based on AP-42 working and breathing loss equations. (R 336.1213(3))
5. The permittee shall calculate on a monthly basis the VOC emission rate in pounds per hour. (R 336.1213(3))

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**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

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PTI No: MI-PTI-B7711-2016

**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. Tank vents 44 and 45	NA	21 <sup>2</sup>	R 336.1201(3)
2. Tank vent 53	NA	36 <sup>2</sup>	R 336.1201(3)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

**EU-LINE-01-AERO  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Aerosol can production Line #1. This line fills cans up to 24 oz capacity with liquid paint or other chemical product. Then gas propellant is added using a "through the valve" pressure filler located in the 1/6 gashouse.

Flexible Group ID: FG-MIX-FILL-CHRG, FG-40CFRPART59, FG-40CFRSUBPARTCCCCCC

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.0010 lb/can <sup>2</sup>	Test Protocol*	EU-LINE-01-AERO propellant pressure filler	SC V.1	R 336.1702(a)
2. VOC	15.0 lpy <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	EU-LINE-01-AERO propellant pressure filler	SC VI.2	R 336.1205(3) R 336.1702(a)

\* Test Protocol shall specify averaging time.

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Cans Processed	30,000,000 cans per year <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	EU-LINE-01-AERO	SC VI.2	R 336.1205(3) R 336.1702(a)

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

1. ~~On or prior to September 30, 2019, the permittee shall verify the VOC emission rates, at the permittee's expense, in accordance with Department requirements. Subsequent testing shall be completed once every five years of operation. (R 336.1213(3))~~

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ROP No: MI-ROP-B7711-2016  
 Expiration Date: July 26, 2021  
 PTI No: MI-PTI-B7711-2016

**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 recordkeeping, reporting or notification special condition.<sup>2</sup> (R 336.1205(3), R 336.1702(a))
2. The permittee shall keep records of the following for EU-LINE-01-AERO using a method approved by the District Supervisor on a monthly basis<sup>2</sup> (R 336.1205(3), R 336.1702(a)):
  - a. Calculations of VOC emission rates in tons per month and tons per 12-month rolling time period.
  - b. Number of cans filled.

**VII. REPORTING**

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

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

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

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-LN-01-AERO1	12 <sup>2</sup>	29.2 <sup>2</sup>	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
2. SV-LN-01-AERO2	24 <sup>2</sup>	22.9 <sup>2</sup>	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

**EU-LINE-09-AERO  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Aerosol can production Line #9. This line fills cans up to 16 oz capacity with liquid paint or other chemical product. Then gas propellant is added using a "through the valve" pressure filler located in the 9/10 gashouse.

Flexible Group ID: FG-MIX-FILL-CHRG, FG-40CFRPART59, FG-40CFRSUBPARTCCCCCC

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.001103 lb/can <sup>2</sup>	Test Protocol*	EU-LINE-09-AERO propellant pressure filler	SC V.1	R 336.1702(a)
2. VOC	18.5 tpy <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	EU-LINE-09-AERO propellant pressure filler	SC VI.2	R 336.1205(3) R 336.1702(a)

\* Test Protocol shall specify averaging time.

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Cans Processed	33,544,878 cans per year <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	EU-LINE-09-AERO	SC VI.2	R 336.1205(3) R 336.1702(a)

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

- ~~On or prior to September 30, 2019, the permittee shall verify the VOC emission rates, at the permittee's expense, in accordance with Department requirements. Subsequent testing shall be completed once every five years of operation. (R 336.1213(3))~~

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ROP No: MI-ROP-B7711-2016  
 Expiration Date: July 26, 2021  
 PTI No: MI-PTI-B7711-2016

**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 recordkeeping, reporting or notification special condition.<sup>2</sup> (R 336.1205(3), R 336.1702(a))
2. The permittee shall keep records of the following for EU-LINE-09-AERO using a method approved by the District Supervisor on a monthly basis<sup>2</sup> (R 336.1205(3), R 336.1702(a)):
  - a. Calculations of VOC emission rates in tons per month and tons per 12-month rolling time period.
  - b. Number of cans filled.

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**VII. REPORTING**

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

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-LN-09-AERO1	20 <sup>2</sup>	39 <sup>2</sup>	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)
2. SV-LN-09-AERO2	26 <sup>2</sup>	39 <sup>2</sup>	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

Administrative  
 Permitting  
 Division  
 Michigan Department of Environment and Natural Resources  
 2200 Townsend Drive  
 Lansing, MI 48906  
 Phone: 517.373.3700  
 Fax: 517.373.3701  
 Email: admin@mic.gov



**EU-LINE10-AERO  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Aerosol can production Line #10. Includes liquid product and gas propellant filling.

Flexible Group ID: FG-MIX-FILL-CHRG, FG-40CFRPART59, FG-40CFRSUBPARTCCCCCCC

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.0010 lb/can <sup>2</sup>	Test Protocol*	EU-LINE-10-AERO propellant pressure filler	SC V.1	R 336.1702(a)
2. VOC	35.9 tpy <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	EU-LINE-10-AERO propellant pressure filler	SC VI.2	R 336.1205(3) R 336.1702(a)

\* Test Protocol shall specify averaging time.

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Cans Processed	60,000,000 cans per year <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	EU-LINE-10-AERO	SC VI.2	R 336.1205(3) R 336.1702(a)

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

a. 1. ~~On or prior to September 30, 2019, the permittee shall verify the VOC emission rates, at the permittee's expense, in accordance with Department requirements. Subsequent testing shall be completed once every five years of operation. (R 336.1213(3))~~

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**Commented [MJS7]: Will another stack test be required in the permit term?**

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PTI No: MI-PTI-B7711-2016

**VI. MONITORING/RECORDKEEPING**

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

a.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 recordkeeping, reporting or notification special condition.<sup>2</sup> (R 336.1213(3))

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b.2. The permittee shall keep records of the following for EU-LINE-10-AERO using a method approved by the District Supervisor on a monthly basis<sup>2</sup> (R 336.1205(3), R 336.1702(a)):

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- a. Calculations of VOC emission rates in tons per month and tons per 12-month rolling time period.
- b. Number of cans filled.

**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
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

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

### D. FLEXIBLE GROUP CONDITIONS

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

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

#### FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-MIX-FILL-CHRG	Process units include: Mezzanine mixing tanks; tank room mixing tanks; aerosol filling line numbers 1, 6, 9, and 10; and bulk liquid filling line number 4. These are designated as "filling processes."	EU-LINE-01-AERO EU-LINE-06-AERO EU-LINE-09-AERO EU-LINE-10-AERO EU-MIXING
FG-RULE-290	Any existing or future emission unit that emits air contaminants that is exempt from the requirements of R 336.1201 pursuant to R 336.1290. Includes four can and four carton coding operations.	EU-LINE-01-VJ EU-LINE-06-VJ EU-LINE-09-VJ EU-LINE-10-VJ EU-LINE-01-MARSH EU-LINE-06-MARSH EU-LINE-09-MARSH EU-LINE-10-MARSH EU-LINE-01-CLEAN EU-LINE-06-CLEAN EU-LINE-09-CLEAN EU-LINE-10-CLEAN
FG-40CFRPART59	This flexible group incorporates the requirements for 40 CFR, Part 59, Subpart C, National Volatile Organic Compound Emission Standards for Consumer Products.	EU-LINE-01-AERO EU-LINE-06-AERO EU-LINE-09-AERO EU-LINE-10-AERO EU-MIXING EU-LINE-04-LIQ
FG-40CFRSUBPARTCCC CCCC	Area Sources: Paints and Allied Products Manufacturing 40 CFR, Part 63, Subpart CCCCCC.	EU-LINE-01-AERO EU-LINE-06-AERO EU-LINE-09-AERO EU-LINE-10-AERO EU-MIXING EU-LINE-04-LIQ
FG-40CFR63SUBPARTZZ ZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).	EU-EM-ENGINE

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Commented [MJS10]: Remove EU-LINE-04-LIQ

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Commented [MJS11]: Add FG-40CFR63SUBPARTZZZZ Area Sources: 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).

**FG-MIX-FILL-CHRG  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Process units include: Mezzanine mixing tanks; tank room mixing tanks; aerosol filling line numbers 1, 6, 9, and 10; and ~~bulk liquid filling line number 4~~. These are designated as "filling processes."

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Emission Units: EU-LINE-01-AERO, EU-LINE-06-AERO, EU-LINE-09-AERO, EU-LINE-10-AERO, EU-MIXING

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**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	108.7 pph from filling processes <sup>2</sup>	Based on a monthly average.	FG-MIX-FILL-CHRG	SC VI.1.c.i	R 336.1702(a)
2. VOC	160.64 tpy from filling processes <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	FG-MIX-FILL-CHRG	SC VI.1.c.ii	R 336.1702(a)
3. VOC	48 pph from aerosol filling line change outs <sup>2</sup>	Based on a monthly average.	FG-MIX-FILL-CHRG	SC VI.1.c.iii	R 336.1702(a)
4. VOC	28.4 tpy from aerosol filling line change outs <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	FG-MIX-FILL-CHRG	SC VI.1.c.iv	R 336.1702(a)
5. Methanol	60 pph from filling processes <sup>1</sup>	Based on a monthly average.	FG-MIX-FILL-CHRG	SC VI.1.c.vii	R 336.1225
6. Methanol	9 tpy from filling processes <sup>1</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	FG-MIX-FILL-CHRG	SC VI.1.c.vii	R 336.1225
7. Dimethyl Ether	16.17 pph from filling processes <sup>1</sup>	Based on a monthly average.	FG-MIX-FILL-CHRG	SC VI.1.c.viii	R 336.1225
8. Dimethyl Ether	48.5 tpy from filling processes <sup>1</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	FG-MIX-FILL-CHRG	SC VI.1.c.viii	R 336.1225

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Product	The permittee shall not process more than 40.17 million gallons of materials per year in the filling processes <sup>2</sup>	Based on a 12-month rolling time period as determined at the end of each calendar month.	FG-MIX-FILL-CHRG	SC VI.1.c.v SC VI.1.c.vi	R 336.1702(a)

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not operate any aerosol propellant filling machine using deicing solution.<sup>2</sup> (R 336.1702(a))

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep a separate record using a method approved by the District Supervisor for each of the following processes specified in this permit<sup>2</sup> (R 336.1702(a); R336.1205(3)); (R 336.1213(3)):
  - a. For each material, solvent, propellant, clean-up solvent, etc. used in the filling processes, record the following on a monthly basis:
    - i. The VOC and HAP content in pounds per gallon of material (minus water) as received.
    - ii. The density in pounds per gallon.
    - iii. The amount used.
  - b. For each individual process unit, record the following on a monthly basis:
    - i. Calculation of VOC and HAP emission rate, in pounds per month and tons per month.
    - ii. Calculation of VOC and HAP emission rate from material filling, in pounds per month and tons per month.
    - iii. Calculation of VOC emission rate from propellant filling, in pounds per month and tons per month.
    - iv. The number of aerosol line propellant change outs.
    - v. Record baseline calculation of VOC emission rate from an aerosol line change out in pounds per change out.
    - vi. Number of cans filled.
    - vii. Record baseline calculation of VOC emission rate from can filling with propellant in pounds per can filled.
    - viii. Hours of operation.
  - c. For the combined filling processes, record the following on a monthly basis:
    - i. Calculation of total VOC emission rate, in pounds per hour, pounds per month, and tons per month.
    - ii. Calculation of total VOC and HAP emission rate, determining a 12-month rolling time period emission rate in tons per year.
    - iii. Calculation of total VOC emission rate, from aerosol line propellant change outs, in pounds per hour, pounds per month, and tons per month.
    - iv. Calculation of total VOC emission rate, from aerosol line propellant change outs, determining a 12-month rolling time period emission rate in tons per year.
    - v. Total number of gallons of material processed per month.

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- vi. Calculation of the number of gallons of material processed, based on a 12-month rolling time period.
- vii. Calculation of methanol emission rate, in pounds per hour, pounds per month, and tons per month, determining a 12-month rolling time period emission rate in tons per year.
- viii. Calculation of dimethyl ether emission rate, in pounds per hour, pounds per month, and tons per month, determining a 12-month rolling time period emission rate in tons per year.

**VII. REPORTING**

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

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-LN-01-GH	14 <sup>1</sup>	40 <sup>1</sup>	R336.1225
2. SV-LN-01-06-GEN	30 <sup>1</sup>	40 <sup>1</sup>	R336.1225
3. SV-LN-05-06-GH	24 <sup>1</sup>	40 <sup>1</sup>	R336.1225
4. SV-LN-09-10-CNC	28 <sup>1</sup>	40 <sup>1</sup>	R336.1225
5. SV-LN-09-10-FLR	32 <sup>1</sup>	40 <sup>1</sup>	R336.1225
6. SV-LN-09-10-GH1	24 <sup>1</sup>	40 <sup>1</sup>	R336.1225
7. SV-LN-09-10-GH2	18 <sup>1</sup>	40 <sup>1</sup>	R336.1225
8. SV-MIXING	16 <sup>1</sup>	40 <sup>1</sup>	R336.1225
9. SV-TR-NORTH	32 <sup>1</sup>	40 <sup>1</sup>	R336.1225
10. SV-TR-WEST	24 <sup>1</sup>	40 <sup>1</sup>	R336.1225

**IX. OTHER REQUIREMENT(S)**

- 1. For the product filling lines, the permittee shall comply with all applicable requirements for volatile organic compound content, labeling of containers, and recordkeeping and reporting pursuant to 40 CFR Part 59 Subpart C (National Volatile Organic Compound Emission Standards for Consumer Products - See FG40CFRPART59). (40 CFR 59.201-214 including Tables and Appendix A)

**Footnotes:**

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

**FG-RULE-290  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Any existing or future emission unit that emits air contaminants that is exempt from the requirements of R 336.1201 pursuant to R 336.1290. Includes four can and four carton coding operations.

**Emission Units:** EU-LINE-01-VJ, EU-LINE-06-VJ, EU-LINE-09-VJ, EU-LINE-10-VJ, EU-LINE-01-MARSH, EU-LINE-06-MARSH, EU-LINE-09-MARSH, EU-LINE-10-MARSH, EU-LINE-01-CLEAN, EU-LINE-06-CLEAN, EU-LINE-09-CLEAN, EU-LINE-10-CLEAN.

**Commented [M3513]:** Add Acetone can cleaning operations: EU-LINE-01-CLEAN, EU-LINE-06-CLEAN, EU-LINE-09-CLEAN, EU-LINE-10-CLEAN

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**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

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

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

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

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the 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))

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))



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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

**FG-40CFRPART59  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

This flexible group incorporates the requirements for 40 CFR, Part 59, Subpart C, National Volatile Organic Compound Emission Standards for Consumer Products.

**Emission Units:** EU-LINE-01-AERO, EU-LINE-06-AERO, EU-LINE-09-AERO, EU-LINE-10-AERO, EU-MIXING, ~~EU-LINE-04-LIQ~~

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**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

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

**II. MATERIAL LIMIT(S)**

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

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not manufacturer any consumer product without ensuring that the VOC content levels do not exceed either the values listed in Tables 1 or the High-Volatility Organic Compound (HVOC) content levels listed in table 2, as detailed in Appendix 9. This provision shall apply only to consumer products manufactured for sale or distribution in the United States. (40 CFR 59.201, 40 CFR 59.203)

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain the following records as required pursuant to 59.209 and detailed below (40 CFR 59.209):
  - a. Product formulations pursuant to 59.209(a)(1)
  - b. Weight percent and chemical composition of the individual product constituents for each batch of production pursuant to 59.209(a)(2)

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**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
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

**FG-40CFRSUBPARTCCCCCCC  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Area Sources: Paints and Allied Products Manufacturing 40 CFR, Part 63, Subpart CCCCCC.

Emission Units: EU-LINE-01-AERO, EU-LINE-06-AERO, EU-LINE-09-AERO, EU-LINE-10-AERO, EU-MIXING,  
~~EU-LINE-04-LIQ~~

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**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

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

**II. MATERIAL LIMIT(S)**

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

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. After December 3, 2012, you must prepare and keep an annual compliance certification report according to the requirements in 40 CFR, 63.11603 paragraphs (b)(1) through (b)(3). If a deviation has occurred during the reporting period, you must submit a deviation report along with your annual compliance certification report required in VII.3. (40 CFR 63.11603)

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee must submit a Notification of Compliance Status in accordance with §63.9(h) of the General Provisions by June 3, 2013. (40 CFR 63.11603)

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
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee must comply with all applicable requirements of 40 CFR, Part 63, Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing. (40 CFR Subpart CCCCCC)

**Footnotes:**

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

**FG 40CFR63SUBPARTZZZ  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

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40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a area source of HAP emissions, existing emergency, compression ignition (CI) RICE equal to or less than 500 brake hp. A RICE is existing if the date of installation is before June 12, 2006.

Emission Unit: EU-EM-ENGINE

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. (40 63.6604(b), 40 CFR 80.510(b))

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**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee must comply with the requirements in Item 4 of Table 2d of 40 CFR Part 63, Subpart ZZZZ which apply to each engine in FG-40CFR63SUBPARTZZZ as specified in the following:

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2;
- b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

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If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. (40 CFR 63.6603(a), 40 CFR Part 63, Subpart ZZZZ, Table 2d.4)

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC III.1. (40 CFR 63.6625(f))
3. The permittee shall operate and maintain each engine in FG-40CFR63SUBPARTZZZ and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a

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maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6605, 40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6.9)

4. For each engine in FG-40CFR63SUBPARTZZZZ, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. (40 CFR 63.6625(h))
5. The permittee may operate each engine in FG-40CFR63SUBPARTZZZZ for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. (40 CFR 63.6640(f)(2))
6. Each engine in FG-40CFR63SUBPARTZZZZ may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in SC III.5. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain each engine in FG-40CFR63SUBPARTZZZZ with non-resettable hours meters to track the operating hours. (40 CFR 63.6625(f))

#### **V. TESTING/SAMPLING**

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

1. If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (40 CFR 63.6625(i))

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#### **VI. MONITORING/RECORDKEEPING**

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

1. For each engine in FG-40CFR63SUBPARTZZZZ, the permittee shall keep in a satisfactory manner the following:
  - a. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.
  - b. Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment.
  - c. Records of performance tests and performance evaluations.

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- d. Records of all required maintenance performed on the air pollution control and monitoring equipment.
- e. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(a), 40 CFR 63.6660)

- 2. For each engine in FG-40CFR63SUBPARTZZZZ the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or of a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(d), 40 CFR 63.6660, 40 CFR Part 63, Subpart ZZZZ, Table 6.9)
- 3. For each engine in FG-40CFR63SUBPARTZZZZ, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(e), 40 CFR 63.6660)
- 4. The permittee shall monitor and record, the total hours of operation for each engine in FG-40CFR63SUBPARTZZZZ on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FG-40CFR63SUBPARTZZZZ on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for emergency operation. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(f), 40 CFR 63.6660)
- 5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FG-40CFR63SUBPARTZZZZ, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 80.510(b))
- 6. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). (40 CFR 63.6660(a))
- 7. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (40 CFR 63.6660(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))
- 4. The permittee shall submit to the AQD District Supervisor, a semiannual compliance report, as specified in 40 CFR 63.6650, which contains all deviations during the reporting period from the operating limitations specified in SC III.1. If there are no deviations from any applicable emission limitations or operating limitations, the report shall contain a statement that there were no deviations during the reporting period. The first report shall cover the period beginning on the applicable compliance date specified in 40 CFR 63.6595 and ending on June 30



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(postmarked or delivered by July 31) or December 31 (postmarked or delivered by January 31), whichever date is the first date following the end of the first calendar half after the applicable compliance date. Each subsequent report must cover the semiannual period from January 1 through June 30, or from July 1 through December 31. The subsequent reports must be postmarked or delivered by July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period, except as allowed in 40 CFR 63.6650(b)(5). The compliance report must also contain the following information, as specified in 40 CFR 63.6650(c) and (d):

- a. Company name and address.
- b. Certification of the report by a responsible official.
- c. Date of report and beginning and ending dates of the reporting period.
- d. The number of malfunctions, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused the operating limitations specified in SC III.1 to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.
- e. The total operating time of the RICE at which the deviation occurred during the reporting period.
- f. The number, duration, and cause of deviations and the corrective action taken.

A copy of the compliance report shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. (40 CFR 63.6640(b), 40 CFR 63.6650(b), (c), and (d), 40 CFR 63.6660)

See Appendix 8

#### VIII. STACK/VENT RESTRICTION(S)

NA

#### IX. OTHER REQUIREMENT(S)

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

#### Footnotes:

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

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

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## **E. NON-APPLICABLE REQUIREMENTS**

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

**APPENDICES**

**Appendix 1. Acronyms and Abbreviations**

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

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

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#### Appendix 2. Schedule of Compliance

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

#### Appendix 3. Monitoring Requirements

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

#### Appendix 4. Recordkeeping

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

#### Appendix 5. Testing Procedures

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

#### Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B7711-2011. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B7711-2011 is being reissued as Source-Wide PTI No. MI-PTI-B7711-2016

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

#### Appendix 7. Emission Calculations

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

## Appendix 8. Reporting

### A. Annual, Semiannual, and Deviation Certification Reporting

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

### B. Other Reporting

The permittee shall use the following approved formats and procedures for the reporting requirements referenced in FG-40CFRPART59. Alternative formats must be approved by the AQD District Supervisor:

#### 1. Initial Notification Report:

- a. Permittee shall provide written certification to the USEPA pursuant to 59.209(a) by compliance date or within 30 days after becoming a regulated entity. This report shall include the following information:
  - i. Company name
  - ii. Name, title, phone number, address, and signature of certifying company official
  - iii. List of product categories and subcategories subject to 59.203
  - iv. Description of the date coding systems in use
  - v. Name and location of designated recordkeeping agent if to be maintained by the manufacturer

#### 2. Changes to date coding system reported in the Initial Notification Report:

- a. Permittee shall provide notification of such changes within 30 days following any change.

#### 3. Within 30 days from written request by USEPA:

- a. Permittee shall provide the following information:
  - i. Location of facility or facilities manufacturing, importing, or distributing subject consumers products
  - ii. List of product categories and subcategories subject to Tables 1 or 2
  - iii. Location where VOC content records are kept

#### 4. Innovative Product Provision 59.204:

- a. Permittee shall provide notification of any innovative products meeting the requirements of 59.204(a) prior to the availability of the product for sale or distribution

## Appendix 9. 40 CFR Part 59 Requirements

Pursuant to 40 CFR, Part 59, the permittee shall maintain compliance with the VOC limitations as detailed below:

Table 1. VOC Content Limits by Product Category

Product category	VOC content limit (weight-percent VOC)
Air fresheners:	
• Single-phase	70
• Double-phase	30
• Liquids/pump sprays	18
• Solids/gels	3
Automotive windshield washer fluid	35
Bathroom and tile cleaners:	
• Aerosols	7
• All other forms	5
Carburetor and choke cleaners	75

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Cooking sprays--aerosol	18
Dusting aids:	
• Aerosols	35
• All other forms	7
Engine degreasers	75
Fabric protectants	75
Floor polishes/waxes:	
• Products for flexible flooring materials	7
• Products for non-resilient flooring	10
• Wood floor wax	90
Furniture maintenance products-aerosol	25
General purpose cleaners	10
Glass cleaners:	
• Aerosols	12
• All other forms	8
Hairsprays	80
Hair mousses	16
Hair Styling gels	6
Household adhesives:	
• Aerosols	75
• Contact	80
• Construction and panel	40
• General purpose	10
• Structural waterproof	15
Insecticides:	
• Crawling bug	40
• Flea and tick	25
• Flying bug	35
• Foggers	45
Lawn and Garden	20
Laundry pre-wash:	
• Aerosols/solids	22
• All other forms	5
Laundry starch products	5
Nail polish removers	85
Oven cleaners:	
• Aerosols/pump	8
• Liquids	5
Shaving creams	5

Table 2 HVOC<sup>2</sup> Content Limits for Underarm Deodorants and Underarm Antiperspirants

Product category	HVOC Percent content limit (weight-percent HVOC)
Underarm antiperspirants--aerosol	60
Underarm deodorants--aerosol	20

<sup>1</sup> Consumer products manufactured or imported on or after December 10, 1998, except as provided in paragraphs 59.203(b or c), 59.204, or 59.206.

<sup>2</sup> High-volatility organic compound (HVOC) are VOC with vapor pressure greater than 80 millimeters of mercury at 20°C.