

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

EFFECTIVE DATE: September 27, 2011

ISSUED TO

Ford Motor Company - Automatic Transmission New Product Center

State Registration Number (SRN): M4734

LOCATED AT

35500 Plymouth Road, Livonia, Michigan 48150

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-M4734-2011

Expiration Date: September 27, 2016

Administratively Complete ROP Renewal Application Due Between  
March 27, 2015 and March 27, 2016

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-M4734-2011

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

Michigan Department of Environmental Quality

Chris Ethridge, Acting Southeast Michigan District Supervisor

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## AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source- wide PTI No. MI-PTI-M4734-2011 pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

### General Provisions

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

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

### Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

### Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
  - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
  - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<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). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

## Monitoring/Recordkeeping

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

## Certification & Reporting

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

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

## Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
  - a. The applicable requirements are included and are specifically identified in the ROP.
  - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
  - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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

## Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

## Reopenings

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



## Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(7))**

## Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant 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, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
  - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
  - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

## Emission Trading

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

## Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<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, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<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).

## **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.

For the purpose of the contiguous site being a synthetic minor for HAPs, certain Source-Wide Terms and Conditions encompass all process equipment at the site, including equipment covered by other permits, grandfathered equipment and exempt equipment. For these Conditions, the term Source-Wide comprises two stationary sources: Ford Motor Company, Livonia Transmission Plant (SRN A8645) and Ford Motor Company, Automatic Transmission New Product Center (SRN: M4734).

## SOURCE-WIDE CONDITIONS

### POLLUTION CONTROL EQUIPMENT

1. NA

### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each individual HAP	Less than 10.0 tpy	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SCVI. 1	R336.1213(2)
2. Aggregate HAP's	Less than 25.0 tpy	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SCVI. 1	R336.1213(2)
For the purpose of the limits at I.1 and I.2, Source-Wide comprises of the total and individual HAP emissions from the M4734 and A8645 contiguous sites.					

### II. MATERIAL LIMIT(S)

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

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

1. NA

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

1. NA

### V. TESTING/SAMPLING

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

1. NA

See Appendix 5

### VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep the following information on a monthly basis:
  - a. Individual and aggregate HAP emissions calculations determining the monthly emissions rate of each in tons per calendar month from SOURCE-WIDE. For the purpose of this condition, SOURCE-WIDE comprises the individual and total HAP emissions from the Ford Motor Company A8645 and M4734 contiguous sites. Alternatively for bulk chemical usage which has quarterly records data, usage shall be prorated to each month using hours of operations or production data.
  - b. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month from SOURCE-WIDE.

For the purpose of this condition, SOURCE-WIDE comprises the individual and total HAP emissions from the Ford Motor Company A8645 and M4734 contiguous sites. Alternatively for bulk chemical usage which has quarterly records data, usage shall be prorated to each month using hours of operations or production data.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R336.1213(3))**

See Appendices 4 and 7

**VII. REPORTING**

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

See Appendix 8

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

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

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

**IX. OTHER REQUIREMENT(S)**

1. 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-PHASE3	Dynamometer testing facilities that include 22 engine driven dynamometer test cells. Three catalytic thermal oxidizers or three regenerative thermal oxidizers control hydrocarbon and carbon monoxide emissions from the test cells.	1-1-1995/NA	FG-PHASE3
EU-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	NA	FG-COLDCLEANERS
EU-EEF1	Dynamometer testing facilities that include 7 test cells.	12-01-1990/NA	FGPHASE2
EU-EEF2	Dynamometer testing facilities that include 6 test cells.	12-01-1990/NA	FGPHASE2
EU-EEF3	Dynamometer testing facilities that include 5 test cells.	12-01-1990/NA	FGPHASE2
EU-EEF4	Dynamometer testing facilities that include 3 test cells.	12-01-1990/NA	FGPHASE2
EU-CHASSISROLLS	Vehicle chassis rolls used to put miles on test vehicles for purposes of vehicle certification required Title II of the Clean Air Act.	12-01-1990/NA	FG-PHASE2
EU-VEHICLEREFUEL	Vehicle refueling of test and Ford vehicles	12-01-1990/NA	FG-GASDISPENSING
EU-UST1	20,000-Gallon gasoline underground storage tank	12-01-1990/NA	FG-GASDISPENSING
EU-UST2A	6,000-Gallon gasoline underground storage tank (adjoins 14,000-gallon diesel storage tank)	12-01-1990/NA	FG-GASDISPENSING
EU-GASDISPENSING	6,000 & 20,000-gallon gasoline storage tanks (Tanks serve the dynamometer cells, vehicle chassis rolls, vehicle on-road and test track calibration and transmission testing operations)	12-01-1990/NA	FG-GASDISPENSING

### 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
FGPHASE2	All dynamometers and chassis rolls in Phase 2 that are exempt from Rule 201 pursuant to R285(g). Total maximum design capacity of all dynamometers in Phase 2 is 3,312,000 BTU/hr.	EU-EEF1, EU-EEF2, EU-EEF3, EU-EEF4 EU-CHASSISROLLS
FG-PHASE3	Dynamometer testing facilities that include 22 engine driven dynamometer test cells. Three catalytic thermal oxidizers or three regenerative thermal oxidizers control hydrocarbon and carbon monoxide emissions from the test cells.	EU-PHASE3
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979	EU-COLDCLEANERS
FG-RULE 287(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c).	FG-RULE 290
FG-RULE 290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	FG-RULE 290
FG-GASOLINE DISPENSING ≥10,000 AND <100,000/MONTH	Gasoline dispensing operation <100,000 gallons per month and ≥ 10,000 gallons per month subject to 40 CFR 63 Subpart CCCCC.	EU-GASDISPENSING EU-UST1 EU-UST2A EU-VEHICLEREFUEL EU-EEF1, EU-EEF2, EU-EEF3, EU-EEF4 EU-CHASSISROLLS EU-PHASE3

## FG – PHASE2

### FLEXIBLE GROUP CONDITIONS

**DESCRIPTION**

Dynamometer testing facilities that include 21 engine driven dynamometer test cells and chassis rolls, Phase 2, that are exempt from Rule 201 pursuant to R285(g). Total maximum design capacity of all dynamometers in Phase 2 is 3,312,000 BTU/hr.

**Emission Units:** EU-EEF1, EU-EEF2, EU-EEF3, EU-EEF4, EU-CHASSISROLLS

**POLLUTION CONTROL EQUIPMENT**

1. NA

**I. EMISSION LIMIT(S)**

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

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel	1,750,000 gallons total	Per Year (12 month rolling time period as determined at the end of each calendar month)	EU-EEF1, EU-EEF2, EU-EEF3, EU-EEF4 EU-CHASSISROLLS	SC VI.1 SC VI.2	(R336.1213(2)(d))*

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

1. NA

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

1. NA

**V. TESTING/SAMPLING**

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

1. NA

See Appendix 5

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain the following records, in a manner acceptable to the Department:
  - a. Type of fuel used (e.g., diesel, unleaded gasoline, or leaded gasoline)
  - b. Fuel usage rate. See Appendix 4 and 7  
(R336.1213(3)(b)(ii))



**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

- 1. 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 – PHASE3

### EMISSION UNIT CONDITIONS

**DESCRIPTION**

Dynamometer testing facilities that include 22 engine driven dynamometer test cells. Three catalytic thermal oxidizers or three regenerative thermal oxidizers are used to control hydrocarbon and carbon monoxide emissions from the test cells.

**Emission Unit ID:** EU-PHASE3

**POLLUTION CONTROL EQUIPMENT**

Catalytic Thermal Oxidizer 5, Catalytic Thermal Oxidizer 6, Catalytic Thermal Oxidizer 7 or Regenerative Thermal Oxidizer 5, Regenerative Thermal Oxidizer 6, Regenerative Thermal Oxidizer 7

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	3801.6 <sup>2</sup> Pounds	Per Day (prorated from monthly)	FG-PHASE3	V. 1,2,5,6,7,8 VI. 1,2,3	<b>40 CFR 52.21</b>
2. NOx	98.2 <sup>2</sup> tpy	12-month rolling time period as determined at the end of each calendar month	FG-PHASE3	V. 1,2,5,6,7,8 VI. 1,2,3	<b>40 CFR 52.21</b>
3. SO2	506.88 <sup>2</sup> Pounds	Per Day (prorated from monthly)	FG-PHASE3	V. 3,4 VI. 1,3	<b>R336.1201(3)</b>
4. SO2	13.1 <sup>2</sup> tpy	12-month rolling time period as determined at the end of each calendar month	FG-PHASE3	V. 3,4 VI. 1,3	<b>R336.1201(3)</b>
5. VOC	139.2 <sup>2</sup> Pounds <sup>2</sup>	Per Day (prorated from monthly)	FG-PHASE3	V. 1,2,3,5,6,7,8 VI. 1,2,3	<b>R336.1702(c)</b>
6. VOC	3.6 <sup>2</sup> tpy	12-month rolling time period as determined at the end of each calendar month	FG-PHASE3	V. 1,2,3,5,6,7,8 VI. 1,2,3	<b>R336.1702(c)</b>

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel	12672 Gallons <sup>2</sup>	Per Day (prorated from monthly)	FG-PHASE3	VI. 1,3	<b>R336.1201(3)</b>
2. Fuel	652500 Gallons <sup>2</sup>	Per Year (12 month rolling time period as determined at the end of each calendar month)	FG-PHASE3	VI. 1,3	<b>R336.1201(3)</b>
3. Lead	7.0 kilograms <sup>2</sup>	Per Week, when using leaded fuel	FG-PHASE3	V. 4; VI. 1,3	<b>R336.1201(3)</b>

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

1. The permittee shall not operate any of the test cells unless a minimum inlet temperature of 600 degrees Fahrenheit in the associated catalytic thermal oxidizer, or a minimum retention time of 0.5 seconds and a minimum chamber temperature of 1400 degrees Fahrenheit (based on a 3-hour average) for the regenerative thermal oxidizer(s) being utilized to control emissions from the cell, is maintained<sup>2</sup>. **(R336.1910)**

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

1. The permittee shall not operate Banks 5, 6, and/or 7 of internal combustion engine test cells with associated dynamometers, hereafter "test cell", unless the associated catalytic oxidizer for Bank 5, 6, and/or 7, or sufficient regenerative thermal oxidizer capacity, is installed and operating properly<sup>2</sup>. **(R336.1910)**

**V. TESTING/SAMPLING**

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

1. Verification of the VOC and Nitrogen oxides emission rates from a representative regenerative thermal oxidizers, by testing, at owner's expense, is required within 365 days of issuance of this permit if an acceptable VOC and Nitrogen oxides test has not been conducted within 5 years prior to the issuance of the ROP, unless the permittee has submitted an acceptable demonstration that the most recent acceptable test remains valid and representative. Verification of the VOC and Nitrogen oxides emission rates include the submittal of a complete report of the test results. No less than 30 days prior to testing, a complete testing plan must be submitted to the AQD. The final plan must be approved by the AQD prior to testing. No less than 7 days before any tests are conducted, the permittee shall notify the AQD District Supervisor, in writing, of the time and place of the test and who will be conducting it. **(R336.1213(3), R336.2001(3))**
2. If the existing Catalytic Thermal Oxidizers (CTO) are brought back on line, the following parameters shall be tested/recorded for one of the catalytic thermal oxidizers within 12 months of restart of the CTO unit(s):
  - a. Nitrogen oxides
  - b. VOCA different catalytic thermal oxidizer shall be tested every five years. **(R336.1213(3))**
3. The permittee shall determine the maximum sulfur content and lead content (when leaded fuel is used) in each fuel using an ASTM-approved method or fuel supplier certification. See Appendix 7. **(R336.1213(3))**
4. The Permittee shall use the following methods when testing the above parameters<sup>2</sup>:
  - a. EPA-approved method such as Federal Reference Test Method 7e **((R336.2004(a))**
  - b. EPA-approved method such as Federal Reference Test Method 25a **((R336.2004(a))**

**See Appendix 5**

**VI. MONITORING/RECORDKEEPING**

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

1. Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**
2. The permittee shall monitor and record the following parameters either electronically, using a strip chart recorder, or by manual logging:
  - a. For catalytic thermal oxidizers—the exhaust gas temperature immediately before and after the catalytic bed
  - b. For regenerative thermal oxidizers—the temperature of the exhaust gas in the chamberTemperature readings shall be recorded at least once every 15 minutes (4 per hour). For the regenerative thermal oxidizers, temperature readings shall be averaged over each successive 3-hour block time period when the temperature drops below 1400°F. **(R336.1213(3)(b)(ii))**
3. The permittee shall maintain the following records, in a manner acceptable to the Department:
  - a. Days of operation per month

- b. Type of fuel used (e.g., diesel, unleaded gasoline, or leaded gasoline)
  - c. Fuel usage rate. See Appendix 4 and 7
  - d. When leaded fuel is used, Lead content of fuels used, pounds per gallon
  - e. Sulfur content of fuels used, pounds per gallon
  - f. Weekly lead usage rate when using leaded fuel, kilograms
  - g. Emissions testing results for nitrogen oxides and VOC
  - h. NOx, SO2, and VOC emissions calculations per day and per year as outlined in Table I
  - i. Temperature readings for the oxidizers as described in S.C. VI 2.
- (R336.1213(3)(b)(ii))**

See Appendices 4 & 7

**VII. REPORTING**

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

See Appendix 8

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

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTO5	44 <sup>2</sup>	68.5 <sup>2</sup>	<b>R336.1201(3)</b>
2. SVRTO6	44 <sup>2</sup>	68.5 <sup>2</sup>	<b>R336.1201(3)</b>
3. SVRTO7	44 <sup>2</sup>	68.5 <sup>2</sup>	<b>R336.1201(3)</b>

**IX. OTHER REQUIREMENT(S)**

- 1. 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-COLDCLEANERS FLEXIBLE GROUP CONDITIONS**

### **DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

**Emission Unit:** EU-COLDCLEANERS

### **I. EMISSION LIMIT(S)**

1. NA

### **II. MATERIAL LIMIT(S)**

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

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

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

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

1. The cold cleaner must meet one of the following design requirements:
  - a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(h))**
  - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
  - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
  - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**

- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

**V. TESTING/SAMPLING**

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

- 1. NA

**VI. MONITORING/RECORDKEEPING**

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

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
- 2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
  - a. A serial number, model number, or other unique identifier for each cold cleaner.
  - b. The date the unit was installed, manufactured or that it commenced operation.
  - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
  - d. The applicable Rule 201 exemption.
  - e. The Reid vapor pressure of each solvent used.
  - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

**VII. REPORTING**

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

**See Appendix 8**

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

- 1. NA

**IX. OTHER REQUIREMENT(S)**

- 1. NA

**FGRULE 287(c)  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c).

**Emission Unit:** EU-RULE 287(c)

**POLLUTION CONTROL EQUIPMENT**

**I. EMISSION LIMIT(S)**

1. NA

**II. MATERIAL LIMIT(S)**

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

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

1. NA

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

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

**V. TESTING/SAMPLING**

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

1. NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 287(c), Permit to Install Exemption Record form (EQP 3562) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
  - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(c)(iii))**
  - b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. **(R 336.1213(3))**

**See Appendix 4**

## **VII. REPORTING**

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

**See Appendix 8**

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

1. NA

## **IX. OTHER REQUIREMENT(S)**

1. NA



<b>FGRULE 290</b> <b>FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

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

**Emission Unit:** EU-RULE 290

**POLLUTION CONTROL EQUIPMENT**

**I. EMISSION LIMIT(S)**

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

- b. The visible emissions from the emission unit are not more than 5 percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**
- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

## **II. MATERIAL LIMIT(S)**

- 1. NA

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

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

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

- 1. NA

## **V. TESTING/SAMPLING**

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

- 1. NA

## **VI. MONITORING/RECORDKEEPING**

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

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

**See Appendix 4**

**VII. REPORTING**

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

**See Appendix 8**

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

1. NA

**IX. OTHER REQUIREMENT(S)**

1. NA

**FG-GASOLINE DISPENSING  $\geq$ 10,000 AND  $<$ 100,000/MONTH  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

This flexible group includes existing and new/reconstructed stationary gasoline dispensing facilities (GDFs) that have a maximum monthly gasoline throughput of at least 10,000 gallons and no more than 100,000 gallons and located at an area source of hazardous air pollutants (HAPs). GDF means any stationary source which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine use solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment. The equipment used for the refueling of motor vehicles is not covered by this subpart (63.11112)

**Emission Unit:** EU-GASDISPENSING, EU-UST1, EU-UST2A, EU-VEHICLEREFUEL, EU-EEF1, EU-EEF2, EU-EEF3, EU-EEF4, EU-PHASE3

**POLLUTION CONTROL EQUIPMENT**

**I. EMISSION LIMIT(S)**

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

**II. MATERIAL LIMIT(S)**

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

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

1. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to the following:
  - a) Minimize gasoline spills. **(40 CFR 63.11116(a)(1))**
  - b) Clean up spills as expeditiously as practicable. **(40 CFR 63.11116(a)(2))**
  - c) Cover all pen gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use. **(40 CFR 63.11116(a)(3))**
  - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. **(40 CFR 63.11116(a)(4))**
  - e) Portable gasoline containers that meet the requirements of 40 CFR part 59 Subpart F, are considered acceptable for compliance with SC III.1(c) above. **(40 CFR 63.11116(d))**

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

1. The permittee shall only load gasoline into storage tanks by utilized submerged filling as specified below: **(40 CFR 63.11117(b))**
  - a) Submerged fill pipes installed on or before November 9, 2006 must be no more than 12 inches from the bottom of the storage tank. **(40 CFR 63.11117(b)(1))**

- b) Submerged fill pipes installed after November 9, 2006 must be no more than 6 inches from the bottom of the storage tank. **(40 CFR 63.11117(b)(2))**
- c) Gasoline storage tanks with a capacity of less than 250 gallons are not required to have submerged fill requirements. **(40 CFR 63.11117(b)(3))**

**V. TESTING/SAMPLING**

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

- 1. NA

**See Appendix 5**

**VI. MONITORING/RECORDKEEPING**

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

- 1. The permittee shall keep records of the monthly throughput of gasoline through each GDF. Records of the monthly throughput must be available within 24 hours of a request by the administrator to document your gasoline throughput. **(40 CFR 63.11116(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 an initial notification that you are subject to this subpart by May 9, 2008, or at the time you become subject to the control requirements in 63.11117, unless you meet the requirements in SC VII.6 below. The initial notification must contain the following information: **(40 CFR 63.11124(a)(1))**
  - a) The name and address of the owner and the operator.
  - b) the address (i.e., physical location) of the GDF.
  - c) A statement that the notification is being submitted in response to this subpart (Gasoline Distribution Area MACT, 40 CFR 63 Subpart CCCCCC) and identifying the requirements in paragraphs (a), (b), and (c)(1) or paragraph (c)(2) of 63.11117 that apply to you.

The notification must be submitted to the applicable EPA Regional Office and delegated State authority as specified in 63.13.

- 5. The permittee shall Submit a Notification of Compliance Status to the applicable USEPA Regional Office and the delegated state authority, as specified in 63.13, in accordance with the schedule specified in 63.9(h), unless you meet the requirements in SC VII.6 below. **40 CFR 63.11124(a)(2))**
- 6. If prior to January 10, 2008, you are operating in compliance with an enforceable State, local, or tribal rule or permit that requires submerged fill as specified in 63.11117(b), you are not required to submit an Initial Notification or a Notification of Compliance Status under SC VII.4 or SC VII.5 listed above. **(40 CFR 63.11117(a)(3))**

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart CCCCCC, for Gasoline Dispensing Facilities. **(40 CFR, Part 63, Subparts A and 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).

### E. NON-APPLICABLE REQUIREMENTS

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

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUPHASE3	40 CFR 64.2 - CAM plan applicability	<p>Requirements for CAM plan applicability:</p> <ul style="list-style-type: none"> <li>a) The unit is subject to an emissions limitation or standard for the applicable regulated air pollutant</li> <li>b) The unit uses a control device to achieve compliance with any such limitation or standard</li> </ul> <p>ATNPC uses a control device (CTO or RTO) for CO and hydrocarbon emissions. However, this source is not subject to a CO limitation in the existing RO permit nor is it subject to BACT requirements for CO. Although there is a control device and emissions limitation in the RO permit for VOC's, the potential to emit does not exceed any major source thresholds. Therefore, this source is not subject to a CAM plan.</p>
EURTACU	40 CFR 63 – Subpart JJJJJJ NESHAPs for Industrial, Commercial, and Institutional Boilers	U.S. EPA promulgated Subpart JJJJJJ effective May 20, 2011. Those final rules exclude all gas-fired boilers at area sources. ATNPC does not have any boilers that would be classified as combusting a fuel (e.g., oil, coal, biomass) other than gas, therefore Subpart JJJJJJ does not apply to ATNPC.
EU-COLDCLEANERS	40 CFR 63 Subpart T – NESHAPs for Halogenated Solvent Cleaning	According to 40 CFR 63.460(a), this standard applies to units that use solvents with concentrations of 5% or more by weight of halogenated compounds. In the current ROP, there is a condition limiting halogenated compound concentrations to 5% or less by weight. Therefore, this standard does not apply.
SOURCE-WIDE	40 CFR Part 63, Subpart PPPPP – NESHAPs for Engine Test Cells/Stands	According to 40 CFR 63.9285(a), an engine test cell is any apparatus used for testing uninstalled stationary or uninstalled mobile engines. Engines are not tested at ATNPC; they are used to drive the transmissions for transmission testing. Therefore, this unit is not subject to the Engine Test Cell MACT standards. Also, this facility is considered an existing source under the MACT and according to 63.9285(b) "existing sources do not have to meet the requirements of this subpart or subpart A of this part."
	40 CFR Part 63, Subpart PPPP –	40 CFR Part 63, Subpart PPPP establishes

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
	NESHAPs for Engine Test Cells/Stands	emission limits for new engine test cells at a source that is major for hazardous air pollutants (HAPs). ATNPC is not major for HAPs as constrained by the source-wide conditions contained in this ROP.
SOURCE-WIDE	40 CFR Part 63, Subpart ZZZZ – NESHAPs for Reciprocating Internal Combustion Engines, 40 CFR Part 60, Subparts IIII and JJJJ for Compression Ignition and Spark Ignition Internal Combustion Engines	<p>The engines used in the test cells are used for research and developmental purposes and are not stationary internal combustions engines subject to the RICE MACT (40 CFR Part 63, Subpart ZZZZ) or the CI ICE NSPS (40 CFR Part 60, Subpart IIII) or the SI ICE NSPS (40 CFR Part 60, Subpart JJJJ).</p> <p>The facility does not operate emergency RICE or any other stationary RICE.</p>
SOURCE-WIDE	40 CFR 63, Subpart HHHHHH	ATNPC does not use manual spray-application equipment to apply coatings to parts and products.
SOURCE-WIDE	40 CFR 63, Subpart XXXXXX	ATNPC is not one of the "Nine Metal Fabrication and Finishing Source Categories" identified in 40 CFR 63.11514 of Subpart XXXXXX as listed in Table 1 of the preamble. See Federal Register, Vol. 73, No. 142, July 23, 2008, p. 42979.



## APPENDICES

### Appendix 1. Abbreviations and Acronyms

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

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

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

## Appendix 2. Schedule of Compliance

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

## Appendix 3. Monitoring Requirements

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

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EUPHASE3. Alternative formats or procedures must be approved by the AQD District Supervisor.

1. Fuel usage rate, gallons, prorated per Appendix 7:
  - daily
2. Fuel usage rate, gallons, non-prorated:
  - monthly
  - rolling 12-month time period

Should the prorated daily fuel usage rate exceed 90% of the daily limit, the permittee shall commence daily recordkeeping for a minimum of two months until the prorated rate falls below 90% of the weekly limit as calculated at the end of the month.

Should the prorated weekly lead usage rate exceed 90% of the weekly limit, the permittee shall commence weekly recordkeeping for a minimum of two months until the prorated rate falls below 90% of the daily limit as calculated at the end of the month.

The permittee shall use the DEQ Rule 287(c) Permit to Install Exemption Record form or an alternative format acceptable to the AQD District Supervisor to document monthly records as required by R 336.1287(c) and FGRULE287(c).

### **RULE 287(c) PERMIT TO INSTALL EXEMPTION RECORD: SURFACE COATING EQUIPMENT**

*This record is provided as a courtesy for businesses by the Michigan Department of Environmental Quality (MDEQ), Environmental Assistance Division, Clean Air Assistance Program, and is not required to be returned or submitted to the MDEQ unless specifically requested.*

Applicable Rule: Rule 287(c) of the Michigan Air Pollution Control Rules

**NOTE:** Rule 287(c) of the Michigan Air Pollution Control Rules exempts surface coating operations from the Permit to Install program as long as the following conditions are met:

1. The coating use rate shall not be more than 200 gallons, as applied, minus water, per month;
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system; and
3. Monthly coating usage records are maintained on file for the most recent two-year period and are made available to the MDEQ Air Quality Division upon request. (ROP-subject sources must keep records for five years.)

*Please print or type all information.*

<b>COMPLETE THE MONTHLY COATING USAGE LOG FOR EACH SURFACE COATING LINE USING THE EXEMPTION IN RULE 287(c).</b>	
<b>INSTRUCTIONS FOR COMPLETING THE MONTHLY COATING USAGE LOG:</b>	
<b>Columns</b>	
Columns (a) and (b):	Identify the name of the coating manufacturer and the product identification number. This information can be obtained from the coating container or the MSDS.
Column (c):	List the coating type. This may include but not be limited to the following: precoat, primer/primer surfacer, primer sealer, topcoat, thinners, and reducers.
Column (d):	Record the volume of coating used, as applied, minus water, in gallons. At the end of the month, total the quantities in column (d). This total should not exceed 200 gallons. [To find the volume as applied, minus water, multiply the amount used by 1 minus the volume fraction of water in the coating. For example, if you use 5 gallons of a coating that is 40% water by volume, multiply 5 by (1-0.40). This calculation yields a coating usage of 3 gallons, as applied, minus water.]
Column (e)	Initials of operator or owner.
Column (f)	Record the volume of cleanup solvents used in gallons. Even though Rule 287(c) does not address cleanup solvent usage, it is advisable to keep track of this usage. Facilities that receive Michigan Air Pollution Reporting Forms should include their usage of cleanup solvent on the forms.

SOURCE NAME:
MONTH/YEAR:

Manufacturer (a)	Product ID Number (b)	Coating Type (c)	Coating Usage (gal) (d)	Operator's Initials (e)	Cleanup Solvent Usage (gal) (f)

		Total coating used (gal) <200 gal/month		Total cleanup solvent used (gal)	

**RULE 290 PERMIT TO INSTALL EXEMPTION: SOURCES WITH LIMITED EMISSIONS RECORD**

*This record is provided as a courtesy for businesses by the Michigan Department of Environmental Quality (MDEQ), Environmental Science and Services Division, Clean Air Assistance Program, and is not required to be returned or submitted to the MDEQ.*

Applicable Rule: Rule 290 of the Michigan Air Pollution Control Rules

**NOTE:**

- Rule 290 of the Michigan Air Pollution Control Rules exempts an emission unit with limited emissions from having to apply for Permit to Install. Rule 201 requires sources to obtain a Permit to Install prior to the installation, construction, reconstruction, relocation, and modification of an emission unit. Sources using this exemption must not meet any of the criteria in Rule 278 and must be able to demonstrate compliance with the various emission limits contained in Rule 290.
- Utilization of this form is not the sole method of demonstrating compliance with the requirements of Rule 290, unless required by a permit such as a Renewable Operating Permit (ROP). For example, an alternative method of demonstrating compliance could be determining the emissions of air contaminants from a single unit of production and recording the number of production units generated per month.
- ROP subject sources – This document may be used to track emissions unless an alternate format is acceptable to the District Supervisor or an alternate format is cited in the ROP.
- An emission unit that emits an air contaminant, excluding noncarcinogenic Volatile Organic Compounds (VOCs) and noncarcinogenic, non-ozone forming materials listed in Rule 122(f), which has an Initial Threshold Screening Level (ITSL) or Initial Risk Screening Level (IRSL) less than 0.04 micrograms per cubic meter (ug/m3) cannot use Rule 290.
- For all emission units exempt pursuant to Rule 290 with particulate emissions which have an ITSL equal to or less than 2.0 ug/m3 and greater than or equal 0.04 ug/m3, the particulate emissions must be included in Section 2.
- For all emission units exempt pursuant to Rule 290 with particulate emissions which have an IRSL equal to or less than 0.04 ug/m3, the particulate emissions must be included in Section 3.

- Perchloroethylene is the only non-ozone forming material listed in Rule 122(f) that is a carcinogen. Two of the stabilizers in Rule 122(f) Table 11, tertiary butyl alcohol and 1,2-butylene oxide, are carcinogenic and are ozone forming materials.
- If an emission unit is equipped with a control device (i.e., equipment that captures and/or destroys air contaminants) and the control device is not vital to production of the normal product of the process or to its normal operation, then there are two options of recording emissions in Sections 2, 3, and 4:
  1. record all uncontrolled emissions of air contaminants (i.e., all air contaminants entering the control device); or
  2. record all controlled emissions of air contaminants (all air contaminants leaving the control device).
 Whatever option is chosen, make sure that option is used consistently throughout Sections 2, 3, 4, and 5.
- If the emission unit is not equipped with a control device or the control device is vital to production of the normal product of the process or to its normal operation, then the quantity of each emission of air contaminant identified in Sections 2, 3, 4, and 5 should be recorded as uncontrolled emissions.
- Monthly emission records are required to be maintained on file for the most recent two-year period and made available to the MDEQ, Air Quality Division upon request. (ROP subject sources must keep records for the most recent five year period.)

**Please print or type all information.**

<b>1. COMPLETE FOR EACH EMISSION UNIT USING THE EXEMPTION IN RULE 290.</b>
SOURCE NAME:
MONTH/YEAR:
DESCRIPTION OF EMISSION UNIT (including control devices):
..... ..... .....

<b>2. RECORD EMISSIONS OF NONCARCINOGENIC AIR CONTAMINANTS (EXCLUDING NONCARCINOGENIC VOCS AND NONCARCINOGENIC, NON-OZONE FORMING MATERIALS LISTED IN RULE 122(f)) (see Appendix A)</b>			
<b>ITSL ≥ 2.0 ug/m3</b>			
(The emissions of noncarcinogenic particulate air contaminants with an ITSL > 2.0 ug/m3 do not have to be recorded in this table as long as the emission unit is in compliance with the requirements in Section 6.)			
<b>CAS #</b>	<b>Chemical Name</b>	<b>Uncontrolled Emissions (lbs/month)</b>	<b>Controlled Emissions (lbs/month)</b>
Monthly Total		①	②
<b>2.0 ug/m3 &gt; ITSL ≥ 0.04 ug/m3</b>			
<b>CAS #</b>	<b>Chemical Name</b>	<b>Uncontrolled Emissions (lbs/month)</b>	<b>Controlled Emissions (lbs/month)</b>



Compliance Criteria:

- The total in Box ⑦ must be ≤ 1,000 pounds or the total in Box ⑧ must be ≤ 500 pounds. If the total in Box ⑦ or in Box ⑧ is greater than the respective emission limitations, contact your local district office.

**5. RECORD TOTAL MONTHLY EMISSIONS**

	lbs/month
Total uncontrolled emissions (Box ① + Box ③ + Box ⑤ + Box ⑦ )	
Total controlled emissions (Box ② + Box ④ + Box ⑥ + Box ⑧ )	

Compliance Criteria:

- The total uncontrolled emissions (Box ① + Box ③ + Box ⑤ + Box ⑦) must be ≤ 1,000 pounds. If the total uncontrolled emissions are greater than 1,000 pounds, contact your local district office; or
- The total controlled emissions (Box ② + Box ④ + Box ⑥ + Box ⑧ ) must be ≤ 500 pounds. If the total controlled emissions are greater than 500 pounds, contact your local district office.

**6. NONCARCINOGENIC PARTICULATE AIR CONTAMINANTS**

The emission unit may emit noncarcinogenic particulate air contaminants provided that the emission unit is in compliance with the following:

Y N

- Are the particulate emissions 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 pounds of particulate per 1,000 pounds of exhaust gases and which do not have an exhaust gas flow rate of more than 30,000 actual cubic feet per minute?
- Are the visible emissions from the emission unit not more than 5% opacity in accordance with the methods contained in Rule 303?
- Is the Initial Threshold Screening Level (ITSL) for each particulate air contaminant, excluding nuisance particulate > 2.0 ug/m3?

Notes:

- Quantities of particulates being emitted from an emission unit complying with the requirements in this Section should not be included in Section 2.
- Quantities of noncarcinogenic particulates with an ITSL  $\leq 2.0$  ug/m3 and  $\geq 0.04$  ug/m3 must be included in Section 2.
- Quantities of carcinogenic particulates > 0.04 ug/m3 must be included in Section 3.

Compliance Criteria:

- If any of the preceding questions concerning noncarcinogenic particulate air contaminants are answered "No", contact your local district office.

**7. OTHER REQUIREMENTS**

- Attach emission calculations to demonstrate compliance with the emission limits identified in Sections 2, 3, 4, and 5.
- Keep this record on file for a minimum of 2 years, if not required for a longer period from other requirements, i.e. ROP.

**APPENDIX for Rule 290**

**R 336.1122 Definitions; V.**

Rule 122. As used in these rules:

(f) "**Volatile organic compound**" means any compound of carbon or mixture of compounds of carbon that participates in photochemical reactions, excluding the following materials, all of which have been determined by the United States environmental protection agency to have negligible photochemical reactivity:

- (i) Carbon monoxide.
- (ii) Carbon dioxide.
- (iii) Carbonic acid.
- (iv) Metallic carbides or carbonates.
- (v) Boron carbide.
- (vi) Silicon carbide.
- (vii) Ammonium carbonate.
- (viii) Ammonium bicarbonate.



- (ix) Methane.
- (x) Ethane.
- (xi) The methyl chloroform portion of commercial grades of methyl chloroform, if all of the following provisions are complied with:
  - (A) The commercial grade of methyl chloroform is used only in a surface coating or coating line that is subject to the requirements of part 6 or 7 of these rules.
  - (B) The commercial grade of methyl chloroform contains no stabilizers other than those listed in table 11.
  - (C) Compliance with the applicable limits specified in part 6 or 7 of these rules is otherwise not technically or economically reasonable.
  - (D) All measures to reduce the levels of all organic solvents, including the commercial grade of methyl chloroform, from the surface coating or coating line to the lowest reasonable level will be implemented.
  - (E) The emissions of the commercial grade of methyl chloroform do not result in a maximum ambient air concentration exceeding any of the allowable ambient air concentrations listed in table 11.
  - (F) The use of the commercial grade of methyl chloroform is specifically identified and allowed by a permit to install, permit to operate, or order of the department.
  - (G) Table 11 reads as follows:

**TABLE 11**

Commercial grade of methyl chloroform --  
Allowable ambient air concentrations

Compound	ppm <sup>1</sup>	Time <sup>2</sup>
Methyl chloroform	3.5	1 hour
Tertiary butyl alcohol <sup>3</sup>	1.0	1 hour
Secondary butyl alcohol <sup>3</sup>	1.0	1 hour
Methylal <sup>3</sup>	10.0	1 hour
1,2-butylene oxide <sup>3</sup>	0.028 and 0.00041	1 hour  annual

- (xii) The methyl chloroform portion of commercial grades of methyl chloroform that contain any other stabilizer not listed in table 11 of this rule, if all of the following provisions are complied with:
  - (A) The commercial grade of methyl chloroform is used only in a surface coating or coating line that is subject to the requirements of part 6 or 7 of these rules.
  - (B) Compliance with the applicable limits specified in part 6 or 7 of these rules is otherwise not technically or economically reasonable.
  - (C) All measures to reduce the levels of all organic solvents, including the commercial grade of methyl chloroform, from the surface coating or coating line to the lowest reasonable level will be implemented.
  - (D) The emissions of any compound in the commercial grade of methyl chloroform that is listed in table 11 of this rule do not result in a maximum ambient air concentration exceeding any of the allowable ambient air concentrations listed in table 11.
  - (E) The emission of all compounds in the commercial grade of methyl chloroform that are not listed in table 11 is demonstrated to comply with R 336.1901.
  - (F) The use of the commercial grade of methyl chloroform is specifically identified and allowed by a permit to install, permit to operate, or order of the department.

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1. Parts per million, by volume  
2. Averaging time period  
3. This compound is a stabilizer

- (xiii) Acetone.
- (xiv) Cyclic, branched, or linear completely methylated siloxanes.
- (xv) Parachlorobenzotrifluoride.
- (xvi) Perchloroethylene.
- (xvii) Trichlorofluoromethane (CFC-11).
- (xviii) Dichlorodifluoromethane (CFC-12).
- (xix) 1,1,2-trichloro-1,2,2-trifluoroethane (CFC-113).
- (xx) 1,2-dichloro 1,1,2,2-tetrafluoroethane (CFC-114).
- (xxi) Chloropentafluoroethane (CFC-115).
- (xxii) 1,1-dichloro 1-fluoroethane (HCFC-141b).
- (xxiii) 1, chloro 1,1-difluoroethane (HCFC-142b).
- (xxiv) Chlorodifluoromethane (HCFC-22).
- (xxv) 1,1,1-trifluoro 2,2-dichloroethane (HCFC-123).
- (xxvi) 2-chloro-1,1,1,2-tetrafluoroethane (HCFC-124).
- (xxvii) Trifluoromethane (HFC-23).
- (xxviii) Pentafluoroethane (HFC-125).
- (xxix) 1,1,2,2-tetrafluoroethane (HFC-134).
- (xxx) 1,1,1,2-tetrafluoroethane (HFC-134a).
- (xxxi) 1,1,1-trifluoroethane (HFC-143a).
- (xxxii) 1,1-difluoroethane (HFC-152a).
- (xxxiii) 3,3-dichloro-1, 1,1,2,2-pentafluoropropane (HCFC-225ca).
- (xxxiv) 1,3-dichloro-1,1,2,2,3-pentafluoropropane (HCFC-225cb).
- (xxxv) 1,1,1,2,3,4,4,5,5,5-decafluoropentane (HFC 43-10mee).
- (xxxvi) Difluoromethane (HFC-32).
- (xxxvii) Ethyl fluoride (HFC-161).
- (xxxviii) 1,1,1,3,3,3-hexafluoropropane (HFC-236fa).
- (xxxix) 1,1,2,2,3-pentafluoropropane (HFC-245ca).
- (xl) 1,1,2,3,3- pentafluoropropane ( HFC-245ea).
- (xli) 1,1,1,2,3- pentafluoropropane (HFC-245eb).
- (xlii) 1,1,1,3,3- pentafluoropropane (HFC-245fa).
- (xliii) 1,1,1,2,3,3-hexafluoropropane (HFC-236ea).
- (xliv) 1,1,1,3,3-pentafluorobutane (HFC365mfc).
- (xlv) Chlorofluoromethane (HCFC-31).
- (xlvi) 1,2-dichloro-1,1,2-trifluoroethane (HCFC-123a).
- (xlvii) 1-chlor-1-fluoroethane (HCFC-151a).
- (xlviii) 1,1,1,2,2,3,3,4,4-nonafluoro-4-methoxybutane.
- (xlix) 2-(difluoromethoxymethyl)-1,1,1,2,3,3,3-heptafluoropropane.
- (l) 1-ethoxy-1,1,2,2,3,3,4,4,4-nonafluorobutane.

- (ii) 2-(ethoxydifluoromethyl)-1,1,1,2,3,3,3-heptafluoropropane.
- (iii) Methyl acetate.
- (liii) Perfluorocarbon compounds that fall into the following classes:
  - (A) Cyclic, branched, or linear, completely fluorinated alkanes.
  - (B) Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations.
  - (C) Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations.
  - (D) Sulfur-containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.
- (liv) Methylene chloride.

**The methods described in R 336.2004 and R 336.2040 shall be used for measuring volatile organic compounds for purposes of determining compliance with emission limits. Where such a method also measures compounds with negligible photochemical reactivity, these negligibly-photochemical reactive compounds may be excluded as volatile organic compounds if the amount of such compounds is accurately quantified and such exclusion is approved by the department.**

**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 since the effective date of previously issued ROP No. MI-ROP-M4734-2011.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)

**Appendix 7. Emission Calculations**

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EU-PHASE3. Alternative calculations must be approved by the AQD District Supervisor.

Prorated daily fuel usage, gallons = (Monthly fuel usage in gallons) / (days of operation per month).

Prorated weekly lead usage, pounds = (Prorated daily fuel usage in gallons) x (lead content of fuel, pounds per gallon) x (7 days/week).

Daily Sulfur dioxide emissions, pounds = (Prorated daily fuel usage in gallons) x (sulfur content of fuel, pounds per gallon) x (2 pounds sulfur dioxide / pound sulfur) summed for each fuel (e.g., diesel, unleaded gasoline, leaded gasoline) used.

Annual Sulfur dioxide emissions, tons = (Annual fuel usage in gallons) x (sulfur content of fuel, pounds per gallon) x (2 pounds sulfur dioxide / pound sulfur) x (ton / 2000 pounds).

Daily Nitrogen Oxide emissions, pounds = (Prorated daily fuel usage in gallons) \* (NOx emission factor, pounds per gallon) summed for each fuel (e.g. diesel, unleaded gasoline, leaded gasoline) used.

Annual Nitrogen Oxides emissions, tons = (Annual fuel usage in gallons) \* (NOx emissions factor, pounds per gallon) \* (ton/2000 lbs) summed for each fuel (e.g. diesel, unleaded gasoline, leaded gasoline) used.

Daily Volatile Organic Compounds (VOC) emissions, pounds = (Prorated daily fuel usage in gallons) \* (VOC emission factor, pounds per gallon) summed for each fuel (e.g. diesel, unleaded gasoline, leaded gasoline) used.

Annual Volatile Organic Compounds (VOC) emissions, tons = (Annual fuel usage in gallons) \* (VOC emission factor, pounds per gallon) \* (ton/2000 pounds) summed for each fuel (e.g. diesel, unleaded gasoline, leaded gasoline) used.

## **Appendix 8. Reporting**

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

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

### **B. Other Reporting**

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