



Michigan Department of Natural Resources and Environment  
Air Quality Division

EFFECTIVE DATE: January 1, 2011

REVISION DATE(S):

ISSUED TO

Hi-Tech Coatings, Inc.

State Registration Number (SRN): N5747

LOCATED AT

24600 Industrial Hwy, Warren, Michigan 48089

### **RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-N5747-2011

Expiration Date: December 31, 2015

Administratively Complete ROP Renewal Application Due Between July 1, 2014 and July 1, 2015

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

### **SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-N5747-2011

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

Michigan Department of Natural Resources and Environment

Christopher Ethridge, Acting Southeast Michigan District Supervisor

**TABLE OF CONTENTS**

**AUTHORITY AND ENFORCEABILITY..... 3**

**A. GENERAL CONDITIONS ..... 4**

Permit Enforceability ..... 4

General Provisions..... 4

Equipment & Design ..... 5

Emission Limits ..... 5

Testing/Sampling ..... 5

Monitoring/Recordkeeping ..... 6

Certification & Reporting ..... 6

Permit Shield..... 7

Revisions ..... 8

Reopenings..... 8

Renewals ..... 9

Stratospheric Ozone Protection ..... 9

Risk Management Plan..... 9

Emission Trading ..... 9

Permit To Install (PTI) ..... 10

Alternative Operating Scenarios ..... 11

Emissions Cap ..... 11

Streamlined Requirements ..... 11

Consent Orders..... 11

Consent Judgment..... 11

Temporary Sources ..... 12

**B. SOURCE-WIDE CONDITIONS..... 13**

**C. EMISSION UNIT CONDITIONS ..... 16**

EMISSION UNIT SUMMARY TABLE ..... 16

EUPURGE ..... 18

EMISSION UNIT CONDITIONS..... 18

**D. FLEXIBLE GROUP CONDITIONS ..... 20**

FLEXIBLE GROUP SUMMARY TABLE ..... 20

FGLINES..... 21

FGPARTSWASHLINES..... 27

FGFACILITY ..... 29

**E. NON-APPLICABLE REQUIREMENTS..... 31**

**APPENDICES..... 32**

Appendix 1. Abbreviations and Acronyms ..... 32

Appendix 2. Schedule of Compliance ..... 33

Appendix 3. Monitoring Requirements ..... 33

Appendix 4. Recordkeeping..... 33

Appendix 5. Testing Procedures ..... 33

Appendix 6. Permits to Install ..... 33

Appendix 7. Emission Calculations ..... 33

Appendix 8. Reporting ..... 34

## AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order No. 19-2010, entered on August 17, 2010, between the MDNRE and the permittee.

## 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-N5747-2011 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 reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

## Risk Management Plan

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

## Emission Trading

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

## Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. <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, MDNRE. <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, MDNRE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. <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).

## Acid Rain

The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to Rule 299(d) and 40 CFR, Part 72.9(c)(1)(i). **(R 336.1213)(10))**

## Alternative Operating Scenarios

The permittee shall maintain contemporaneous records at the facility of any changes from one operating scenario to another. This includes recording in a log the scenario under which it is operating and any additional information associated with the scenario in question, including, but not limited to batch records, fuel records, operating schedule, or process records. **(R 336.1213(8)(a))**

## Emissions Cap

The permittee shall provide written notification to the department and the USEPA at least seven days in advance of any emissions trade among emission units within the stationary source, solely for the purpose of complying with an emissions cap. The notice shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of this ROP. **(R 336.1213(9)(a))**

## Streamlined Requirements

Compliance with this term or condition/limit shall be considered compliance with all of the following applicable requirement(s)/limit(s) which have been subsumed under this streamlined requirement: {list} **(R 336.1213)**

## Consent Orders

The conditions contained in this ROP for which a Consent Order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Order. The effective date of termination is defined for the purposes of this condition as the date upon which the Termination Order is signed by the Chief of the AQD.

## Consent Judgment

The conditions contained in this ROP for which a Consent Judgment is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Judgment.

## Temporary Sources

The permittee of a temporary source shall notify the department not less than ten days in advance of each change in location. **(R 336.1213(11))**

## Sectioned ROPs with Stationary Source-Wide Requirements Having Multiple Responsible Officials

Each responsible official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). **(R 336.1213(4)(c))**

## Clean Air Interstate Rule (CAIR)

If a source is subject to CAIR requirements, insert the CAIR Sulfur Dioxide Budget Permit, the CAIR Annual Nitrogen Oxide Budget Permit and the CAIR Ozone Nitrogen Oxide Budget Permit (as applicable) for all subject facilities into the first available appendix after Appendix 8 or the first available appendix after the Acid Rain Permit (if applicable). Each permit must be in its own appendix in the order as listed. Add the following conditions to either the Emission Unit table for each affected unit or the Flexible Group table if it is structured to include multiple subject units:

- The permittee shall hold allowances for compliance deductions in the source's compliance account of the allowance transfer deadline in an amount not less than the total NOx emissions for the control period from the source pursuant to 40 CFR, Part 97.354. **(40 CFR, Part 97.354)**

## Rule 801

Standardized special conditions to be used for a NOx emission unit subject to Rule 801 are located in Attachment Four of the ROP Shell Instructions.

## Compliance Assurance Monitoring (CAM)

Standard conditions to be used for an emission unit subject to CAM can be found in Attachment Five of the ROP Shell Instructions.

## **B. SOURCE-WIDE CONDITIONS**

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

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

## SOURCE-WIDE CONDITIONS

### POLLUTION CONTROL EQUIPMENT

#### I. EMISSION LIMIT(S)

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

#### II. MATERIAL LIMIT(S)

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

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

1.

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

1.

#### V. TESTING/SAMPLING

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

NA

#### VI. MONITORING/RECORDKEEPING

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

NA

#### 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.			

**IX. OTHER REQUIREMENT(S)**

- The conditions contained in this ROP for which a consent order (CO) is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the CO. The effective date of termination is defined for purposes of the conditions as the date upon which the Termination Order is signed by the Chief of the AQD. **(CO No. 19-2010, Rule No. 336.1201(3))**

**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-LINE1	One Dip Spin Machine Model #24 with an in-line Natural Gas Fired Curing Oven, all connected to and exhausted through a regenerative thermal oxidizer.	9/23/1997	FGLINES FGFACILITY
EU-LINE3	Two Chain on Edge Spray Booths each equipped with a permanent total enclosure and Two Natural Gas Fired Curing Ovens connected to and exhausted through a regenerative thermal oxidizer.	9/23/1997	FGLINES FGFACILITY
EU-LINE4	Two Chain on Edge Spray Booths each equipped with a permanent total enclosure, One Natural Gas Fired Curing Oven connected to and exhausted through a regenerative thermal oxidizer.	7/1/1997	FGLINES FGFACILITY
EU-LINE5	One Enclosed Sprimag Chain on Edge Spray Booth with an electric oven equipped with a common permanent total enclosure controlled by a regenerative thermal oxidizer.	6/14/2004	FGLINES FGFACILITY
EU-LINE6	One Dip Spin Machine Model #10 with parts routed to EU-BATCHOVEN, both connected to and exhausted through a regenerative thermal oxidizer.	10/15/2008	FGLINES FGFACILITY
EU-LINE7	One Dip Spin Machine Model #24 with an in-line Natural Gas Fired Curing Oven, all connected to and exhausted through a regenerative thermal oxidizer.	9/23/1997	FGLINES FGFACILITY
EU-LINE8	One Tumble Spray Unit connected to and exhausted through a regenerative thermal oxidizer.	2/25/2009	FGLINES FGFACILITY
EU-LINE9	One Tumble Spray Unit connected to and exhausted through a regenerative thermal oxidizer.	2/25/2009	FGLINES FGFACILITY
EU-LINE10	One Tumble Spray Unit connected to and exhausted through a regenerative thermal oxidizer.	2/25/2009	FGLINES FGFACILITY

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-LINE11	One Automatic HVLP Round Table consisting of one primer booth, one topcoat booth, and one electric oven all connected to and exhausted through a regenerative thermal oxidizer.	2/25/2009	FGLINES FGFACILITY
EU-BATCHOVEN	One Natural Gas Fired Batch Oven connected to and exhausted through a regenerative thermal oxidizer	10/27/2005	FGLINES FGFACILITY
EU-PURGE	Purge and Cleanup Solvent Usage for FG-LINES.	9/23/1997	FGFACILITY
EU-PARTSWASHER1	A multi-stage surface preparation line consisting of cleaning, rinsing, pickling and phosphate treatment. Emissions are controlled by a packed bed wet scrubber.	10/22/1997	FGPARTSWASH- LINES
EU-PARTSWASHER2	A multi-stage surface preparation line consisting of cleaning, rinsing, pickling and phosphate treatment. Emissions are controlled by a packed bed wet scrubber.	10/22/1997	FGPARTSWASH- LINES
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

## EUPURGE

### EMISSION UNIT CONDITIONS

**DESCRIPTION:** Purge and Cleanup Solvent Usage for FGLINES.

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** Regenerative thermal oxidizer.

#### I. EMISSION LIMIT

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	1.0 tpy	12-month rolling time period determined at the end of each calendar month.	EUPURGE	SC VI.2	R 336.1702(a)

#### II. MATERIAL LIMIT(S)

NA

#### III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste purge and cleanup solvents and shall store them in closed containers. The permittee shall dispose of all waste purge and cleanup solvents in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**

#### IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUPURGE unless the purge solvent use operations within the FGLINES spray booths are connected to and exhausted through a regenerative thermal oxidizer which is installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1702(a))**

#### V. TESTING/SAMPLING

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each purge solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**

2. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with the EUPURGE:
  - a) Gallons of each solvent used and reclaimed.
  - b) VOC content, in pounds per gallon, of each solvent used.
  - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**

**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. SVRTO1	23 x 50	36	R 336.1225, R 336.1901, R 336.2800, R 336.2804, 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

- 1.

**Footnotes:**

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

## D. FLEXIBLE GROUP CONDITIONS

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

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

### FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGLINES	Facility coating operations with regenerative thermal oxidizer control system.	EU-LINE1, EU-LINE3, EU-LINE4, EU-LINE5, EU-LINE6, EU-LINE7, EU-LINE8, EU-LINE9, EU-LINE10, EU-LINE11, EU-BATCHOVEN
FGPARTSWASHLINES	Each parts washer line is a multi-stage surface preparation consisting of cleaning, rinsing, pickling and phosphate treatment. Emissions are controlled by a packed bed wet scrubber.	EUPARTSWSHR1, EUPARTSWSHR2
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	EU-LINE1, EU-LINE3, EU-LINE4, EU-LINE5, EU-LINE6, EU-LINE7, EU-LINE8, EU-LINE9, EU-LINE10, EU-LINE11, EU-BATCHOVEN, EU-PURGE

**FGLINES**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION:** Facility coating operations with regenerative thermal oxidizer control system.

**POLLUTION CONTROL EQUIPMENT:** Regenerative thermal oxidizer system.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	35.31 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar mo	FGLINES	SC VI.4	R 336.1205, R 336.1702(a), Condition No. 9.B.1, Consent Order AQD No. 19-2010
2. VOC	24.9 pph <sup>1</sup>	Test Protocol*	FGLINES	GC 13	R 336.1702(a), R 336.1910
3. Xylene (CAS No. 1330-20-7)	384 lbs/day <sup>1</sup>	Calendar day	FGLINES	SC VI.5	R 336.1225, R 336.1901, Condition No. 9.B.2, Consent Order AQD No. 19-2010
4. Xylene (CAS No. 1330-20-7)	Less than 18,000 lbs/yr <sup>1</sup>	12-month rolling time period as determined at the end of each calendar mo	FGLINES	SC VI.6	R 336.1205(3), R 336.1225, R 336.1901 Condition No. 9.B.2, Consent Order AQD No. 19-2010
5. Ethyl Benzene (CAS No. 100-41-4)	Less than 18,000 lbs/yr <sup>1</sup>	12-month rolling time period as determined at the end of each calendar mo	FGLINES	SC VI.6	R 336.1205(3), R 336.1225, R 336.1901, R 336.1225, R 336.1901 Condition No. 9.B.3, Consent Order AQD No. 19-2010

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
6. Formaldehyde (CAS No. 50-00-0)	560 lbs/yr <sup>1</sup>	12-month rolling time period as determined at the end of each calendar mo	FGLINES	SC VI.6	R 336.1225, R 336.1901, R 336.1225, R 336.1901, Condition No. 9.B.4, Consent Order AQD No. 19-2010
7. VOC	1.8 lb/gal of coating (minus water)**, after control <sup>1</sup>	Daily volume-weighted average (calendar day).	FGLINES	SC VI.4	R 336.1702(a), R 336.1602(4) Condition No. 9.B.1, Consent Order AQD No. 19-2010

\* Test Protocol shall specify averaging time.  
 \*\* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound.  
<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

## II. MATERIAL LIMITS

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste coatings and solvents and shall store them in closed containers. The permittee shall dispose of all waste coatings and solvents in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1702(a))**
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
3. The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
4. The permittee shall maintain a minimum of 0.007 inches of water pressure differential between the permanent total enclosure (PTE) and the adjacent area on a continuous basis for each of the chain on edge spray booths within EU-LINE3 and EU-LINE4, the Sprimag Booth/Oven of EU-LINE5, and the Model #10 dip-spin machine of EU-LINE6. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
5. The permittee shall maintain the air pressure within each of the chain on edge ovens of EU-LINE3 and EU-LINE4, within EU-BATCHOVEN, and within the Automatic HVLP Round Table primer booth, topcoat booth, and electric oven of EU-LINE11 lower than the surrounding room air pressure so that air flows into each oven or booth at all times. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

## IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FGLINES unless all respective exhaust filters are installed and operating in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1331, R 336.1901, R 336.1910)**

2. The permittee shall equip and maintain FGLINES with HVLP or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall operate a control system to regulate fluid flow and atomizing pressure and keep test caps available for pressure testing. **(R 336.1702(a))**
3. The permittee shall not operate FGLINES unless the thermal oxidizer capture and control system is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer capture and control system includes a minimum VOC capture efficiency of 90 percent (by weight) for both EULINE1 and EULINE7, a minimum VOC capture efficiency of 100 percent (by weight) for EU-LINE3, EU-LINE4, EU-LINE5, EU-LINE6, EU-LINE8, EU-LINE9, EU-LINE10, and EU-LINE11, a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum combustion zone temperature of 1368°F and a minimum retention time of 0.5 seconds. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor and record the temperature on a continuous basis, during operation of FGLINES. **(R 336.1205, R 336.1225, R 336.1702(a))**
5. The permittee shall not operate any chain on edge spray booths within EU-LINE3 and EU-LINE4, the Sprimag Booth/Oven of EU-LINE5, or the Model No. 10 dip-spin machine of EU-LINE6 unless the respective permanent total enclosure (PTE) for each is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the PTE is operating at a pressure lower than all adjacent areas, so that air flows into the PTE through all Natural Draft Openings (NDOs). NDO is defined as any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan or blower is installed. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
6. The permittee shall not operate any of the chain on edge ovens within EU-LINE3 and EU-LINE4, EU-BATCHOVEN, and within the Automatic HVLP Round Table primer booth, topcoat booth, and electric oven of EU-LINE11 unless the respective enclosure for each is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that each oven and/or booth is operating at a pressure lower than all adjacent areas, so that air flows into the ovens or booths through all natural draft openings (NDOs). NDO is defined as any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan or blower is installed. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
7. The permittee shall calibrate, maintain and operate in a satisfactory manner, device(s) to monitor on a weekly basis the pressure differential between the permanent total enclosure (PTE) and the outside area for each chain on edge spray booth within EU-LINE3 and EU-LINE4, the Sprimag Booth/Oven of EU-LINE5, and the Model #10 dip-spin machine of EU-LINE6, to verify that air is entering the PTE. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
8. The permittee shall not operate the Tumble Spray Units (EU-LINE8, EU-LINE9 AND EU-LINE10) unless these units are operated as sealed enclosures whenever coatings are applied within these units. During coating application, the door seal shall be in place and in proper working order, the door shall be held in the closed position using a vacuum seal and the associated exhaust fan shall be operated to exhaust captured VOC to the regenerative thermal oxidizer. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the VOC content, water content, and density of any coating as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the as received VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. The as applied volume-weighted calendar day average VOC content of coatings (after control) shall be determined by calculation using the as received reducer usage and VOC content information. **(R 336.1205, R 336.1702(a))**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(Condition No. 9.B.12, Consent Order AQD No. 19-2010, R 336.1205, R 336.1225, R 336.1702(a))**
2. When FGLINES are operating, the permittee shall monitor and record, in a satisfactory manner, the temperature in the thermal oxidizer on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. The monitoring and recording device(s) shall be operated in accordance with manufacturer's recommendations as well as incorporating standard industry practices. **(Condition No. 9.B.10, Consent Order AQD No. 19-2013, R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, R 336.1901)**
3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, solvent and thinner, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
4. The permittee shall keep the following information on a monthly basis for FGLINES:
  - a) Gallons (with water) of each coating used and reducer added on a calendar day basis.
  - b) VOC content (minus water and with water) of each coating and reducer, as received.
  - c) VOC emission calculations determining the volume-weighted average VOC content of all coatings as applied before and after controls on a calendar day basis.
  - d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

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

5. The permittee shall keep the following information on a calendar day basis for the FGLINES<sup>1</sup>:
  - a) Gallons (with water) of each Xylene (CAS # 1330-20-7) containing coating and reducer used.
  - b) Where applicable, the gallons (with water) of each Xylene (CAS # 1330-20-7) containing coating and reducer reclaimed.
  - c) The Xylene (CAS # 1330-20-7) content (with water) in pounds per gallon of each coating and reducer used.
  - d) Xylene (CAS # 1330-20-7) mass emission calculations determining the daily emission rate in pounds per calendar day.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1901)**

6. The permittee shall keep the following information on a monthly basis for the FGLINES<sup>1</sup>:
  - a) Gallons (with water) of each Ethyl Benzene (CAS # 100-41-4), Formaldehyde (CAS # 50-00-0), and Xylene (CAS # 1330-20-7) containing coating and reducer used.
  - b) Where applicable, the gallons (with water) of each Ethyl Benzene (CAS # 100-41-4), Formaldehyde (CAS # 50-00-0), and Xylene (CAS # 1330-20-7) containing coating and reducer reclaimed.

- c) The Ethyl Benzene (CAS # 100-41-4), Formaldehyde (CAS # 50-00-0), and Xylene (CAS # 1330-20-7) content (with water) in pounds per gallon of each coating and reducer used.
- d) Ethyl Benzene (CAS # 100-41-4), Formaldehyde (CAS # 50-00-0), and Xylene (CAS # 1330-20-7) mass emission calculations determining the monthly emission rate of each in pounds per calendar month.
- e) Ethyl Benzene (CAS # 100-41-4), Formaldehyde (CAS # 50-00-0), and Xylene (CAS # 1330-20-7) mass emission calculations determining the annual emission rate of each in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1901)**

- 7. The permittee shall keep, in a satisfactory manner, continuous records of the combustion zone temperature in the thermal oxidizer when FGLINES are operating and the dates and results of each temperature monitoring device calibration. The permittee shall keep all records on file and make them available to the Department upon request. **(Condition No. 9.B.10, Consent Order AQD No. 19-2010, R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**
- 8. The permittee shall calibrate the temperature monitoring device at least once every two years from the date of the previous calibration. The calibration shall be conducted consistent with manufacturer's specifications. **(Condition No. 9.B.11, Consent Order AQD No. 19-2010, R 336.1201(3))**
- 9. The permittee shall monitor and record on a weekly basis, in a satisfactory manner, the pressure differential between the permanent total enclosure (PTE) and the outside area for each chain on edge spray booth within EU-LINE3 and EU-LINE4, the Sprimag Booth/Oven of EU-LINE5, and the Model #10 dip-spin machine of EU-LINE6 to verify that air is entering the PTE. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
- 10. The permittee shall keep records of the pressure differential between the PTE and the adjacent area for each chain on edge spray booth within EU-LINE3 and EU-LINE4, the Sprimag Booth/Oven of EU-LINE5, and the Model #10 dip-spin machine of EU-LINE6. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
- 11. The permittee shall semi-annually verify that the direction of air flow at each natural draft opening (NDO) of the enclosure for each of the chain on edge ovens within EU-LINE3 and EU-LINE 4, within EU-BATCHOVEN, and within the Automatic HVLP Round Table primer booth, topcoat booth, and electric oven of EU-LINE11 is into the enclosure. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a complete test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. All test methods, plans, and procedures shall be approved by the AQD prior to testing. After two consecutive tests demonstrate that the direction of air flow at all NDOs is into the enclosure, the permittee may request that the monitoring schedule be revised to a less frequent time period as approved by the District Supervisor. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
- 12. The permittee shall keep records of all verifications of the direction of air flow at the enclosure natural draft openings for each of the chain on edge ovens within EU-LINE3 and EU-LINE 4, within EU-BATCHOVEN, and within the Automatic HVLP Round Table primer booth, topcoat booth, and electric oven of EU-LINE11. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

## **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 RESTRICTIONS**

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. SVRTO1	23 x 50	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

### **IX. OTHER REQUIREMENTS**

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).

## **FGPARTSWASHLINES FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION:** A multi-stage surface preparation line consisting of multiple tanks, some of which are heated and some of which are not heated, used for cleaning, rinsing, pickling and phosphate treatment.

**POLLUTION CONTROL EQUIPMENT:** Packed bed wet scrubber.

**Emission Units:** EU-PARTSWAHER1, EU-PARTSWAHER2

### **I. EMISSION LIMITS**

NA

### **II. MATERIAL LIMITS**

NA

### **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. Prior to wet scrubber maintenance, heated tanks shall be cooled to ambient temperature to minimize emissions<sup>1</sup>. **(R 336.1224, R 336.1901)**
2. The disposal of spent and/or waste materials shall be performed in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1370)**
3. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and Subpart WWWW, as they apply to FGPARTSWASHLINES. **(40 CFR Part 61/63 Subparts A & Subpart WWWW)**

### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate FGPARTSWASHLINES unless the wet scrubber is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the wet scrubber includes being equipped with properly designed hoods and ductwork to capture and control emissions from Cleaning, Acid Rinse, and Phosphating<sup>1</sup>. **(R 336.1224, R 336.1225, R 336.1901, R 336.1910)**
2. The permittee shall not operate FGPARTSWASHLINES unless a gauge, which monitors the water flow to the wet scrubber is installed, maintained and operated in a satisfactory manner. The gauge shall be equipped with an alarm that sounds or flashes red (or yellow) when the water flow malfunctions<sup>1</sup>. **(R 336.1224, R 336.1225, R 336.1901, R 336.1910)**
3. The permittee shall install, maintain and operate in a satisfactory manner a device to monitor the operating temperature of each heated tank in FGPARTSWASHLINES on a once every 8-hour shift basis<sup>1</sup>. **(R 336.1224, R 336.1225, R 336.1901, R 336.1910)**

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

NA

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each raw material used in FGPARTSWASHLINES, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225)**
2. The permittee shall keep, in a satisfactory manner, monthly records of the amounts, in gallons, of raw materials used in FGPARTSWASHLINES. (Note: these records should include materials used for recharging.) All records shall be kept on file and made available to the Air Quality Division upon request. **(R 336.1205, R 336.1224, R 336.1225)**
3. The permittee shall record the operating temperature of each heated tank in FGPARTSWASHLINES at least once every 8-hour shift<sup>1</sup>. **(R 336.1224, R 336.1225, R 336.1901, R 336.1910)**

**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 RESTRICTIONS**

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. EUPARTSWASHLINE1	36	35	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. EUPARTSWASHLINE2	48	28	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENTS**

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).

**FGFACILITY  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION:** All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

**Emission Units:** EU-LINE1, EU-LINE3, EU-LINE4, EU-LINE5, EU-LINE6, EU-LINE7, EU-LINE8, EU-LINE9, EU-LINE10, EU-LINE11, EU-BATCHOVEN, EU-PURGE

**POLLUTION CONTROL EQUIPMENT:** NA

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applic Requirements
1. Each Individual HAP	Less than 9.0 tpy <sup>2</sup>	12-month rolling time period determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3), R 336.1225, R 336.9.B.5, Consent Order AQD No. 19-2010
2. Aggregate HAPs	Less than 22.5 tpy <sup>2</sup>	12-month rolling time period determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3), R 336.1225, R 336.9.B.6, Consent Order AQD No. 19-2010

**II. MATERIAL LIMITS**

NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

NA

**IV. DESIGN/EQUIPMENT PARAMETERS**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the HAP content of any coating as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3))**

2. The permittee shall keep the following information on at least a monthly basis for FG FACILITY:
  - a) Gallons or pounds of each HAP containing material used.
  - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
  - c) HAP content, in pounds per gallon or weight percent, of each HAP containing material used.
  - d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
  - e) 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. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

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

## **VII. REPORTING**

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

See Appendix 8

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

NA

## **IX. OTHER REQUIREMENTS**

1. The permittee shall achieve compliance with Article II, Pollution Control, Part 55 of Act 451 (Part 55), The Natural Resources and Environmental Protection Act, 1994 PA 451 (Act 451), the Conditions of PTI No. 2-03H, and the requirements contained in Consent Order No. 19-2010. **(CO No. 19-2010, Rule No. 336.1201(3))**

### **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 no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

## APPENDICES

### Appendix 1. Abbreviations and Acronyms

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

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Natural Resources and Environment	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H <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
MDNRE	Michigan Department of Natural Resources and Environment	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

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

## Appendix 2. Schedule of Compliance

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

## Appendix 3. Monitoring Requirements

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

## Appendix 4. Recordkeeping

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

## Appendix 5. Testing Procedures

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

## Appendix 6. Permits to Install

The following table lists any Permit to Install and/or Operate, that relate to the identified emission units or flexible groups as of the effective date of this ROP. This includes all Permits to Install and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-N5747-2010. PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
2-03H	Coating and Parts Washer Processes	EUPURGE, FGLINES FGPARTSWASHLINES, FGFACILITY

## Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible group Special Conditions. Therefore, this appendix is not applicable.

## **Appendix 8. Reporting**

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

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

### **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.