

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

FEBRUARY 18, 2021

PERMIT TO INSTALL
381-97B

ISSUED TO
C. L. RIECKHOFF CO., INC.

LOCATED AT
26265 NORTHLINE ROAD
TAYLOR, MICHIGAN 48180

IN THE COUNTY OF
WAYNE

STATE REGISTRATION NUMBER
M3716

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: January 26, 2021	
DATE PERMIT TO INSTALL APPROVED: February 18, 2021	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit 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 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. 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)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

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
EUPAINTLINE1	Metal parts coating line consisting of three spray booths.	9/1997 02/18/2021	FG381-97, FGRTO
EUPAINTLINE2	Metal parts coating line consisting of two spray booths.	9/1997 02/18/2021	FG381-97, FGRTO
EUCLEANUP	Cleanup and purge solvents used in the coating lines.	9/1997 02/18/2021	FG381-97, FGRTO

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 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

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
FG381-97	Metal parts coating operations consisting of two paint lines operating under conditions of PTI 381-97. This flexible group is for operation of the associated equipment before installation of the concentrator and RTO.	EUPAINTLINE1, EUPAINTLINE2, EUCLEANUP
FGRTO	Metal parts coating operations controlled by a roto concentrator and regenerative thermal oxidizer. This flexible group is for operation of the associated equipment after installation of the concentrator and RTO.	EUPAINTLINE1, EUPAINTLINE2, EUCLEANUP

FG381-97
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Metal parts coating operations consisting of two paint lines operating under conditions of PTI 381-97. This flexible group is for operation of the associated equipment before installation of the concentrator and RTO.

Emission Unit: EUPAINTLINE1, EUPAINTLINE2, EUCLEANUP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOCs	9.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUPAINTLINE1	SV VI.1	R 336.1225, R 336.1702(a)
2. VOCs	14.0 lbs/hour	12-month rolling time period as determined at the end of each calendar month	EUPAINTLINE1	SV VI.1	R 336.1225, R 336.1702(a)
3. VOCs	6.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUPAINTLINE2	SV VI.1	R 336.1225, R 336.1702(a)
4. VOCs	11.0 lbs/hour	12-month rolling time period as determined at the end of each calendar month	EUPAINTLINE2	SV VI.1	R 336.1225, R 336.1702(a)
5. VOCs	2.65 tpy	12-month rolling time period as determined at the end of each calendar month.	EUCLEANUP	SC VI.1	R 336.1225, R 336.1702(a)

II. MATERIAL LIMIT(S)

1. The volatile organic compound (VOC) emission rate shall not exceed 3.5 pounds per gallon of coating (minus water) as applied from either EUPAINTLINE1 or EUPAINTLINE2. **(R 336.1702(d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The disposal of spent filters and/or waste coatings shall be performed in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370(1))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any of the five metal parts paint spray booths unless their respective dry filters are installed and operating properly. **(R 336.1224)**
2. Coatings shall be applied utilizing high volume low pressure (HVLP) applicators or equivalent technology with comparable transfer efficiency. All coating applicators shall be properly installed, maintained, and operated according to manufacturer's specifications. **(R 336.1702)**

V. TESTING/SAMPLING

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

1. Verification of VOC emission rates from any or all of the five metal parts paint spray booths, by testing, at owner's expense, in accordance with Department requirements, may be required. The testing shall be conducted within 60 days following the receipt of the written notification of the requirement. Verification of emission rates includes the submittal of a complete report of the test results. If testing is required, a complete test plan must be submitted to the Air Quality Division. The final plan must be approved by the Division prior to testing and a complete report of test results must be submitted to the Division within 60 days following the last date of testing. **(R 336.1225, R 336.1702)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep the following information on a monthly basis for FG381-97:
 - a) For each coating used in EUPAINTLINE1:
 - i. The identification and the coating category.
 - ii. The amount, in gallons, used (minus water).
 - iii. The VOC content in pounds per gallon of coating (minus water) as applied.
 - b) For each coating used in EUPAINTLINE2:
 - i. The identification and the coating category.
 - ii. The amount, in gallons, used (minus water).
 - iii. The VOC content in pounds per gallon of coating (minus water) as applied.
 - c) The amount, in gallons, of cleanup solvent used and reclaimed.
 - d) Total hours of operations of EUPAINTLINE1 and EUPAINTLINE2.
 - e) VOC emission calculations for each emission unit determining VOC emission rates in tons per calendar month.
 - f) VOC emission calculations for each emission unit determining a 12-month rolling time period emission rate in tons per year.
 - g) VOC emission calculations for EUPAINTLINE1 and EUPAINTLINE2, each separately, determining VOC emission rate in pounds per hour.

The permittee shall keep the records using mass balance, or an alternative method and 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 336.1702)**

VII. REPORTING

1. The permittee shall send written notification to the AQD District Supervisor within 7 days of exhausting any emission unit in FG381-97 to the concentrator and RTO. **(R 336.1201)**

VIII. STACK/VENT RESTRICTION(S)

1. The exhaust gases from each of the three metal parts paint spray booths in EUPAINTLINE1 shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 42 inches at an exit point not less than 42 feet above ground level. **(R 336.1225)**

2. The exhaust gases from each of the two metal parts paint spray booths in EUPAINTLINE2 shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 36 inches at an exit point not less than 30 feet above ground level. **(R 336.1225)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the requirements of FG381-97 until the concentrator and RTO have been installed and any emission unit in FG381-97 is exhausted to the control equipment. After any emission unit in FG381-97 has been exhausted to the associated concentrator and RTO, the requirements in FG381-97 are no longer applicable, **(R 336.1201)**

**FGRTO
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Metal parts coating operations controlled by a roto concentrator and regenerative thermal oxidizer. This flexible group is for operation of the associated equipment after installation of the concentrator and RTO.

Emission Unit: EUPAINTLINE1, EUPAINTLINE2, EUCLEANUP

POLLUTION CONTROL EQUIPMENT

Concentrator and regenerative thermal oxidizer.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOCs	12.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGRTO	SC VI.5	R 336.1205, R 336.1225, R 336.1702(a)
2. Acetone	3.0 tpy	12-month rolling time period as determined at the end of each calendar month.	FGRTO	SC VI.6	R 336.1224(1), R 336.1225
3. Hydrotreated light distillate (HLD – CAS# 64742-47-8)	5.0 tpy	12-month rolling time period as determined at the end of each calendar month.	FGRTO	SC VI.7	R 336.1225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGRTO unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the concentrator and regenerative thermal oxidizer, has been submitted within 90 days of permit issuance, and is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**
2. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**

3. The permittee shall handle all VOC and / or 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, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any emission unit or combination of emission units in FGRTTO unless the concentrator and regenerative thermal oxidizer are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the concentrator includes maintaining a minimum desorption gas inlet temperature at the manufacturer's recommended temperature until an acceptable performance test has been performed, after which the desorption gas inlet temperature shall be maintained within 15 degrees of the most recent acceptable performance test. Satisfactory operation of the concentrator and regenerative thermal oxidizer includes a minimum VOC capture efficiency of 80 percent (by weight), a minimum combined VOC removal/destruction efficiency of 85.5 percent (by weight) from the concentrator and regenerative thermal oxidizer, and maintaining a minimum temperature of 1500° F and a minimum retention time of 0.5 seconds. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910)**
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a temperature monitoring device for the concentrator to monitor and record the desorption gas inlet temperature on a continuous basis during operation of FGRTTO. **(R 336.1205, R 336.1225, R 336.1702)**
3. 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 FGRTTO. **(R 336.1225, R 336.1702)**

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 applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the 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. **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. Within 180 days after startup of the concentrator and regenerative thermal oxidizer; and subsequently upon request from the AQD District Supervisor; the permittee shall verify capture efficiency of FGRTTO, and the combined removal/destruction efficiency of the concentrator and regenerative thermal oxidizer. This testing shall be conducted in accordance with Department requirements, 40 CFR 51 Appendix M for capture efficiency, and 40 CFR 60 Appendix A for combined removal efficiency and destruction efficiency. An alternative method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD Technical Programs Unit and District Office. The final plan must be approved by the AQD prior to testing. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1205, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**

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, R 336.1225, R 336.1702(a))**
2. The permittee shall continuously monitor and record the desorption gas inlet temperature during operation of FGRTTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. **(R 336.1205, R 336.1225, R 336.1702(a))**

3. The permittee shall continuously monitor and record the temperature in the combustion chamber of the regenerative thermal oxidizer during operation of FGRTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. **(R 336.1205, R 336.1225, R 336.1702(a))**
4. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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 336.1225, R 336.1702(a))**
5. The permittee shall keep the following information on a monthly basis for the FGRTO:
 - a) Gallons (with water) of each VOC containing material used.
 - b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c) VOC content (with water) of each material as applied.
 - 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 using mass balance, or an alternative 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 336.1225, R 336.1702(a))**

6. The permittee shall keep the following information on a monthly basis for the FGRTO:
 - a) Gallons (with water) of each acetone containing material used.
 - b) Where applicable, gallons or pounds of each acetone containing material reclaimed.
 - c) Acetone content of each material as applied.
 - d) Acetone mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) Acetone 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 using mass balance, or an alternative 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 336.1224(1), R 336.1225)**

7. The permittee shall keep the following information on a monthly basis for the FGRTO:
 - a) Gallons (with water) of each hydrotreated light distillate (HLD – CAS# 64742-47-8) containing material used.
 - b) Where applicable, gallons or pounds of each HLD containing material reclaimed.
 - c) HLD content of each material as applied.
 - d) HLD mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) HLD 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 using mass balance, or an alternative 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)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUPAINTLINE2. **(R 336.1201(7)(a))**
2. The permittee shall send written notification to the AQD District Supervisor within 7 days of exhausting any emission unit in FGRTO to the associated concentrator and RTO. **(R 336.1201)**

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTO	74	42	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the requirements listed in FGRT0 after any emission unit in FGRT0 is exhausted to the associated concentrator and RTO. **(R 336.1205, R 336.1225, R 336.1702)**

Footnotes:

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

FGFACILITY CONDITIONS

DESCRIPTION: The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)
3. Cumene (CAS# 98-82-8)	500 lbs/year ¹	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.4	R 336.1225(2)
4. Ethylbenzene (CAS# 100-41-4)	2.0 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.5	R 336.1225(2)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall determine the HAP content of any material, as received, and as applied, 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 maintain a current listing from the manufacturer of the chemical composition of each material, 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 336.1205(3))**
3. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - 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 pounds per pound, 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.

The permittee shall keep the records using mass balance, or an alternative 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))**

4. The permittee shall keep the following information on a calendar month basis for FGFACILITY:
 - a) Gallons of each cumene containing material used.
 - b) Where applicable, gallons of each cumene containing material reclaimed.
 - c) The cumene content, in pounds per gallon of each cumene containing material used.
 - d) Cumene emission calculations determining the monthly emission rate in pounds per calendar month.
 - e) Cumene emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ **(R 336.1225(2))**

5. The permittee shall keep the following information on a calendar month basis for FGFACILITY:
 - a) Gallons of each ethylbenzene containing material used.
 - b) Where applicable, gallons of each ethylbenzene containing material reclaimed.
 - c) The ethylbenzene content, in pounds per gallon of each ethylbenzene containing material used.
 - d) Ethylbenzene emission calculations determining the monthly emission rate in tons per calendar month.
 - e) Ethylbenzene 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 records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ **(R 336.1225(2))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA