

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

July 8, 2019

**PERMIT TO INSTALL**  
327-98G

**ISSUED TO**  
ProCat Testing, LLC

**LOCATED AT**  
30844 Century Drive  
Wixom, Michigan

**IN THE COUNTY OF**  
Oakland

**STATE REGISTRATION NUMBER**  
N6537

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: <b>May 20, 2019</b>	
DATE PERMIT TO INSTALL APPROVED: <b>July 8, 2019</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**

**Table of Contents**

COMMON ACRONYMS ..... 2  
POLLUTANT / MEASUREMENT ABBREVIATIONS..... 3  
GENERAL CONDITIONS ..... 4  
EMISSION UNIT SPECIAL CONDITIONS..... 6  
    EMISSION UNIT SUMMARY TABLE ..... 6  
FLEXIBLE GROUP SPECIAL CONDITIONS..... 10  
    FLEXIBLE GROUP SUMMARY TABLE ..... 10  
FG-TESTCELLS ..... 11

## 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 <sub>2</sub> 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 <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	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 <sub>2</sub>	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 conditions 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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EU-TESTCELL1	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL2	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL3	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL4	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL5	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EU-TESTCELL6	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL7	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL8	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL9	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL10	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL11	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EU-TESTCELL12	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL13	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL14	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL15	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL16	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL17	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EU-TESTCELL18	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL19	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL20	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL21	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS
EU-TESTCELL22	Dynamometer engine test cell with catalytic converter burning unleaded gasoline, ethanol blends (up to 10%), or diesel fuel. Maximum capacity of 15L Diesel or 8.1 L gasoline engine.	11/9/1998, 2/25/2002 6/5/2007, 11/8/2007, 5/29/2015, 5/18/2017, 2/22/2018, PTI Issuance Date	FG-TESTCELLS

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.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FG-TESTCELLS	Twenty-two (22) dynamometer engine test cells with catalytic converters burning unleaded gasoline, ethanol blends (up to 10%), and diesel fuel.	EU-TESTCELL1, EU-TESTCELL2, EU-TESTCELL3, EU-TESTCELL4, EU-TESTCELL5, EU-TESTCELL6, EU-TESTCELL7, EU-TESTCELL8, EU-TESTCELL9, EU-TESTCELL10, EU-TESTCELL11, EU-TESTCELL12, EU-TESTCELL13, EU-TESTCELL14, EU-TESTCELL15, EU-TESTCELL16, EU-TESTCELL17, EU-TESTCELL18, EU-TESTCELL19, EU-TESTCELL20, EU-TESTCELL21, EU-TESTCELL22

**FG-TESTCELLS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Twenty-two (22) dynamometer engine test cells with catalytic converters burning unleaded gasoline, ethanol blends (up to 10%), and diesel fuel.

**Emission Unit:** EU-TESTCELL1, EU-TESTCELL2, EU-TESTCELL3, EU-TESTCELL4, EU-TESTCELL5, EU-TESTCELL6, EU-TESTCELL7, EU-TESTCELL8, EU-TESTCELL9, EU-TESTCELL10, EU-TESTCELL11, EU-TESTCELL12, EU-TESTCELL13, EU-TESTCELL14, EU-TESTCELL15, EU-TESTCELL16, EU-TESTCELL17, EU-TESTCELL18, EU-TESTCELL19, EU-TESTCELL20, EU-TESTCELL21, EU-TESTCELL22

**POLLUTION CONTROL EQUIPMENT**

Catalytic converters with control efficiencies of 90% for CO and 70% for VOC regardless of fuel type, and a 20% control efficiency for NO<sub>x</sub> when burning unleaded gasoline and ethanol blends (up to 10%).

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. CO	84.8 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC VI.2*	R 336.1205(3)
2. NO <sub>x</sub>	35.9 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC V.1 SC VI.2*	R 336.1205(3), 40 CFR 52.21 (c)&(d)
3. PM2.5	9.6 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC VI.2*	R 336.1205(3), 40 CFR 52.21 (c)&(d)
4. 1,3-Butadiene	0.18 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC VI.2*	R 336.1224, R 336.1225
5. Acetaldehyde	1.54 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC VI.2*	R 336.1224, R 336.1225
6. Benzene	0.37 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC VI.2*	R 336.1224, R 336.1225
7. Formaldehyde	0.38 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month.	FG-TESTCELLS	SC VI.2*	R 336.1224, R 336.1225

\* The permittee shall calculate emissions from FG-TESTCELLS based on fuel usage data recorded per SC VI.2, the destruction efficiencies in SC IV.1, SC IV.2, and SC IV.3, and the following emission factors:

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
Uncontrolled Emission Factor for Diesel:			Uncontrolled Emission Factors for Gasoline:		
CO	0.137 lb/gallon		CO	3.94 lb/gallon	
NO <sub>x</sub>	0.138 lb/gallon		NO <sub>x</sub>	0.150 lb/gallon	
1,3-Butadiene	0.0025 lb/gallon		1,3-Butadiene	0.00192 lb/gallon	
Benzene	0.000448 lb/gallon		Acetaldehyde (non-ethanol gasoline)	0.00175 lb/gallon	
Formaldehyde	0.00015 lb/gallon		Acetaldehyde (ethanol blends)	0.0242 lb/gallon	
			Benzene	0.0057 lb/gallon	
			Formaldehyde	0.00593 lb/gallon	

**II. MATERIAL LIMIT(S)**

1. The permittee shall burn only diesel and unleaded gasoline, and ethanol blends (up to 10%) in FG-TESTCELLS. **(R 336.1205(1)(a)(3), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**
2. The total combined fuel usage for unleaded gasoline and ethanol blends (up to 10%) for FG-TESTCELLS shall not exceed 425,000 gallons per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205(3), R 336.1225, R 336.1702 (a), 40 CFR 52.21 (c) & (d))**
3. The diesel fuel usage for FG-TESTCELLS shall not exceed 150,000 gallons per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205(3), R 336.1225, R 336.1702 (a), 40 CFR 52.21 (c) & (d))**
4. The total combined fuel usage for unleaded gasoline and ethanol blends (up to 10%) for FG-TESTCELLS shall not exceed 1,800 gallons per day. **(R 336.1224, R 336.1225)**
5. The diesel fuel usage for FG-TESTCELLS shall not exceed 720 gallons per day. **(R 336.1224, R 336.1225)**

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

1. The permittee shall not operate any engine in FG-TESTCELLS in wide-open throttle condition. **(R 336.1205(1)(a)(3), R 336.1225, 40 CFR 52.21 (c) & (d))**

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

1. The permittee shall equip and maintain each emission unit included in FG-TESTCELLS with a catalytic converter that will achieve a daily average CO reduction efficiency of 90 percent for the flexible group. Compliance with the percent reduction efficiency will be determined each day by the following procedure:
  - a) Ensure engine is at test condition.
  - b) Using exhaust gas analyzer, measure exhaust emission concentrations before and after the catalyst.
  - c) Calculate reduction efficiency:  

$$DE = (1 - (\text{Emission concentration}_{\text{out}} / \text{Emission concentration}_{\text{in}})) \times 100$$
**(R 336.1205(3), R 336.1910, 40 CFR 52.21 (c) & (d))**
2. The permittee shall equip and maintain each emission unit included in FG-TESTCELLS with a catalytic converter that will achieve a daily average VOC reduction efficiency of 70 percent for the flexible group. Compliance with the percent reduction efficiency will be determined each day by the following procedure:
  - a) Ensure engine is at test condition.
  - b) Using exhaust gas analyzer, measure exhaust emission concentrations before and after the catalyst.
  - c) Calculate reduction efficiency:  

$$DE = (1 - (\text{Emission concentration}_{\text{out}} / \text{Emission concentration}_{\text{in}})) \times 100$$
**(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1910)**
3. The permittee shall equip and maintain each emission unit burning gasoline in FG-TESTCELLS with a catalytic converter that will achieve a daily average NO<sub>x</sub> reduction efficiency of 20 percent for the flexible group

when burning gasoline. Compliance with the percent reduction efficiency will be determined each day by the following procedure:

- a) Ensure engine is at test condition.
- b) Using exhaust gas analyzer, measure exhaust emission concentrations before and after the catalyst.
- c) Calculate reduction efficiency:

$$DE = (1 - (\text{Emission concentration}_{\text{out}} / \text{Emission concentration}_{\text{in}})) \times 100$$

**(R 336.1205(3), R 336.1910, 40 CFR 52.21 (c) & (d))**

## **V. TESTING/SAMPLING**

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

1. The permittee shall verify the NO<sub>x</sub> emission rates from one emission unit in FG-TESTCELLS while burning diesel fuel, by testing at owner's expense a minimum of once every five years of operation in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(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 last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205(3))**
2. The permittee shall keep the following information on a monthly basis for FG-TESTCELLS:
  - a) Gallons of unleaded gasoline, ethanol blends (up to 10%), and diesel fuel used per month and 12-month rolling time period.
  - b) NO<sub>x</sub>, CO, PM2.5, and 1,3-Butadiene, acetaldehyde, benzene, and formaldehyde emission calculations determining the monthly emission rates in tons per calendar month.
  - c) NO<sub>x</sub>, CO, PM2.5, and 1,3-Butadiene, acetaldehyde, benzene, and formaldehyde emission calculations determining the annual emission rates 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(1)(a) and (3), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

3. The permittee shall keep the following information for FG-TESTCELLS during operation:
  - a) Daily records of gallons of unleaded gasoline, ethanol blends (up to 10%), and diesel fuel used.
  - b) Calculations performed Monday through Friday of the total gallons of gasoline used each day. The calculations for Saturday and Sunday shall be performed on Monday.

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 336.1224, R 336.1225)**

4. The permittee shall keep, in a satisfactory manner, daily and monthly average CO, VOC, and NO<sub>x</sub> reduction efficiency records for each catalytic converter installed on FG-TESTCELLS. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3), R 336.1702 (a), R 336.1910, 40 CFR 52.21 (c) & (d))**
5. The permittee shall keep, in a satisfactory manner, a daily record indicating if any engines in FG-TESTCELLS engines were operated in a wide-open throttle condition. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1)(a)(3), R 336.1225, 40 CFR 52.21 (c) & (d))**

**VII. REPORTING**

1. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal. **(R 336.1225(4))**

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

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

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/ Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-STACKA	36	30	R 336.1225, 40 CFR 52.21 (c) & (d)
2. SV-STACKB	36	30	R 336.1225, 40 CFR 52.21 (c) & (d)
3. SV-STACKC	36	30	R 336.1225, 40 CFR 52.21 (c) & (d)
4. SV-STACKD	36	30	R 336.1225, 40 CFR 52.21 (c) & (d)
5. SV-STACKE	36	30	R 336.1225, 40 CFR 52.21 (c) & (d)
6. SV-STACKF	36	30	R 336.1225, 40 CFR 52.21 (c) & (d)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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