

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

September 30, 2022

PERMIT TO INSTALL
285-00B

ISSUED TO
NCP Coatings, LLC

LOCATED AT
225 Fort Street
Niles, Michigan 49120

IN THE COUNTY OF
Berrien

STATE REGISTRATION NUMBER
N2352

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: September 19, 2022	
DATE PERMIT TO INSTALL APPROVED: September 30, 2022	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
EUPAINT	Paint manufacturing including mills, dispersers, portable and stationary mixing tanks, mixers, and container filling.	10/1/2001	NA
EURESIN	Resin manufacturing including resin kettles, thin down tanks, filters, and storage tanks.	10/1/2001	NA
EUTOTECLEAN	Tote cleaner.	TBD	FGSUPPORT
EUTOTECLEAN2	Tote cleaner.	2017	FGSUPPORT
EUTOTEREFURB	Tote refurbishing activities, including tote painting.	10/1/2001	FGSUPPORT
EURECLAIM	Solvent reclamation unit.	TBD	FGSUPPORT
EUPAINT2	Paint manufacturing including mills, dispersers, portable and stationary mixing tanks, mixers, and container filling.	TBD	NA

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.

**EUPAINT
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Paint manufacturing including mills, dispersers, portable and stationary mixing tanks, mixers, and container filling.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Dust collector

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	18 tpy	12-month rolling time period as determined at the end of each calendar month	EUPAINT	SC VI.2	R 336.1205(3), R 336.1702(a)
2. Particulate	0.01 pounds per 1,000 pounds of exhaust gases	NA	EUPAINT	SC IV.1	R 336.1331

3. Visible emissions from EUPAINT shall not exceed a 6-minute average of 5 percent opacity. **(R 336.1301)**

II. MATERIAL LIMIT(S)

1. The permittee shall not produce more than 2,000,000 gallons of coating in EUPAINT per 12 month rolling time period as determined at the end of each calendar month. **(R 336.1205(3), R 336.1702(a))**
2. The triethylamine content of any coating shall not exceed 5 percent by volume. **(R 336.1225, R 336.1901)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall equip all mixing tanks, mills, and dispersers with covers that reduce the air flow across the equipment and completely cover the equipment opening, except for openings which are no larger than necessary to allow safe clearance for the mixer shaft, etc. The openings shall be covered at all times except when operator access is necessary. In addition, all solvent containers shall be closed when not in use. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
2. The permittee shall immediately clean up all spills involving VOCs and volatile HAPs. Clean up shall be conducted in a manner that minimizes VOC and HAP emissions to the air. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
3. The permittee shall keep all VOC and volatile HAP contaminated rags, gloves, sawdust, etc., in closed containers and shall dispose of these materials in a manner that minimizes VOC and HAP emissions to the air. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not charge solids to any equipment normally controlled by a dust collector unless the dust collector is installed and operating properly in accordance with the operation and maintenance plan maintained on site. **(R 336.1205(3), R 336.1301, R 336.1331)**

V. TESTING/SAMPLING

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

NA

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), R 336.1702(a))**
2. The permittee shall keep the following information for EUPAINT:
 - a) Monthly and 12-month rolling time period amount, in gallons, of each product produced and the total for all products. **(R 336.1205(3), R 336.1702(a))**
 - b) Monthly and 12-month rolling time period number of batches produced and the size and cleaning frequency of the equipment. **(R 336.1205(3), R 336.1702(a))**
 - c) The formulation of each product produced including the VOC, Triethylamine, individual HAP, and total HAP contents. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**
 - d) Calculations of the monthly and 12-month rolling time period VOC emission rates using the production, cleaning, and formulation records. **(R 336.1205(3), R 336.1702(a))**

The permittee shall keep all records on file and make them available to the Department upon request.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

1. The exhaust gases from the EUPAINT shall be discharged unobstructed vertically upwards to the ambient air from stacks with maximum diameters of 12 inches at exit points not less than 22 feet above ground level. **(R 336.1225, R 336.1901, 40 CFR 52.21 (c) & (d))**

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

**EURESIN
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Resin manufacturing including resin kettles, thin down tanks, filters, and storage tanks.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Wet scrubber, condenser.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	10 tpy	12-month rolling time period as determined at the end of each calendar month	EURESIN	SC VI.5	R 336.1205(3), R 336.1702(a)
2. Particulate	0.01 pounds per 1,000 pounds of exhaust gases	NA	EURESIN	SC VI.5	R 336.1331

3. Visible emissions from EURESIN, except during addition of phthalic anhydride, shall not exceed a 6-minute average of 5 percent opacity. **(R 336.1301)**
4. Visible emissions from EURESIN, during addition of phthalic anhydride, shall not exceed a 6-minute average of 20 percent opacity except as allowed by Rule 301. **(R 336.1301)**

II. MATERIAL LIMIT(S)

1. The permittee shall not produce more than 651,000 gallons of resin in EURESIN per 12 month rolling time period as determined at the end of each calendar month. **(R 336.1205(3), R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate a resin kettle, except the research and development kettle, unless the scrubber is installed, maintained, and operating properly in accordance with the operation and maintenance plan maintained on site. **(R 336.1205(3), R 336.1301, R 336.1331)**
2. The permittee shall not operate a thin down tank unless the condenser is installed, maintained, and operating properly in accordance with the operation and maintenance plan maintained on site. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain the scrubber with a pressure drop indicator and a liquid flow indicator. **(R 336.1205(3), R 336.1301, R 336.1331, R 336.1910)**

- The permittee shall equip and maintain the condenser with an exhaust gas temperature monitor. **(R 336.1205(3), 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))**

NA

VI. MONITORING/RECORDKEEPING

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

- 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), R 336.1702(a))**
- The permittee shall monitor the pressure drop across the scrubber in accordance with the operation and maintenance plan maintained on site. **(R 336.1205(3), R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall monitor the liquid flow rate of the scrubber in accordance with the operation and maintenance plan maintained on site. **(R 336.1205(3), R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall monitor the exhaust gas temperature of the condenser in accordance with the operation and maintenance plan maintained on site. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
- The permittee shall keep the following information for EURESIN:
 - Monthly and 12-month rolling time period amount, in gallons, of each product produced and the total for all products. **(R 336.1205(3), R 336.1702(a))**
 - Monthly and 12-month rolling time period number of batches produced and the size and cleaning frequency of the equipment. **(R 336.1205(3), R 336.1702(a))**
 - The formulation of each product produced including the VOC, individual HAP, and total HAP contents. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**
 - Calculations of the monthly and 12-month rolling time period VOC emission rates using the production, cleaning, and formulation records. **(R 336.1205(3), R 336.1702(a))**
 - Record of the pressure drop across the scrubber, liquid flow rate of the scrubber, and the exhaust gas temperature of the condenser in accordance with the operation and maintenance plan maintained on site. **(R 336.1205(3), R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1901)**

The permittee shall keep all records on file and make them available to the Department upon request.

VII. REPORTING

NA

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. SVKETTLE	24	40	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
2. SVTHIN	3	33	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

**EUPAINT2
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Paint manufacturing including mills, dispersers, portable and stationary mixing tanks, mixers, and container filling.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Dust collector

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	6.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUPAINT2	SC VI.2	R 336.1205(3), R 336.1702(a)
2. Particulate	0.01 pounds per 1,000 pounds of exhaust gases	Hourly	EUPAINT2	SC V.1	R 336.1331

3. Visible emissions from EUPAINT2 shall not exceed a 6-minute average of 5 percent opacity. **(R 336.1301)**

II. MATERIAL LIMIT(S)

1. The permittee shall not produce more than 175,000 gallons of BarkMark coating in EUPAINT2 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))**
2. The permittee shall not produce more than 200,000 gallons of Waterborne coating in EUPAINT2 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))**
3. The permittee shall not produce more than 200,000 gallons of Rain Resistant coating in EUPAINT2 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))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall equip all mixing tanks, mills, and dispersers with covers that reduce the air flow across the equipment and completely cover the equipment opening, except for openings which are no larger than necessary to allow safe clearance for the mixer shaft, etc. The openings shall be covered at all times except when operator access is necessary. In addition, all solvent containers shall be closed when not in use. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
2. The permittee shall immediately clean up all spills involving VOCs and volatile HAPs. Clean up shall be conducted in a manner that minimizes VOC and HAP emissions to the air. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

3. The permittee shall keep all VOC and volatile HAP contaminated rags, gloves, sawdust, etc., in closed containers and shall dispose of these materials in a manner that minimizes VOC and HAP emissions to the air. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a differential pressure gauge on the dust collector in EUPAINT2. **(R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**
2. The permittee shall not charge solids to any equipment normally controlled by a dust collector unless the dust collector is installed and operating properly in accordance with the MAP. **(R 336.1301, R 336.1331, 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. Upon request of the AQD District Supervisor, the permittee shall verify the PM emission rate from EUPAINT2 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in the table below.

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules

An alternate 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, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. 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 336.1301, R 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) and (d))**

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 336.1702(a))**
2. The permittee shall keep the following information for EUPAINT2:
 - a) Monthly and 12-month rolling time period records of the amount, in gallons, of each product produced.
 - b) Monthly and 12-month rolling time period records of the number of batches produced and the size and cleaning frequency of the equipment.
 - c) The formulation of each product produced including the VOC, individual HAP, and total HAP contents.
 - d) The appropriate emission factors for each product produced:
 - i. The emission factor of 1.0% of total VOCs contained in BarkMark coatings.
 - ii. The emission factor of 0.25% of total VOCs contained in Waterborne and Rain Resistant coatings.
 - e) Calculations of the monthly and 12-month rolling time period VOC emission rates using the production, cleaning and formulation of records.

The permittee shall keep the records using the listed emission factors 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 336.1205(3), R 336.1225, R 336.1702(a))**

3. The permittee shall monitor and record, in a satisfactory manner, at least once per week, during operation, the pressure drop across the dust collector. Each entry shall include the date, time, pressure drop, and initials of the person making the record. **(R 336.1910)**

VII. REPORTING

1. Within 30-days after the completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or authorized agent per 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 EUPAINT2. **(R 336.1201(7)(a))**

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. SVPAINT2	12	22	R 336.1225 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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
FGSUPPORT	The support operations at the facility; consisting of solvent reclamation, tote/tank cleaning and tote repainting.	EUTOTECLEAN, EUTOTECLEAN2, EUTOTEREFURB, EURECLAIM

**FGSUPPORT
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

The support operations at the facility; consisting of solvent reclamation, tote/tank cleaning and tote repainting.

Emission Unit: EUTOTECLEAN, EUTOTECLEAN2, EUTOTEREFURB, EURECLAIM

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	7 tpy	12-month rolling time period as determined at the end of each calendar month	FGSUPPORT	SC II.1, SC II.3, SC III.1, SC IV.1, SC VI.1	R 336.1205(3), R 336.1702(a)
2. VOC	1.4 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUTOTECLEAN2	SC II.2, SC VI.1	R 336.1225

II. MATERIAL LIMIT(S)

1. The permittee shall not use more than 24,000 gallons of cleaning solvent in EUTOTECLEAN and EUTOTECLEAN2, combined, per 12 month rolling time period as determined at the end of each calendar month. **(R 336.1205(3), R 336.1702(a))**
2. The permittee shall not use more than 1,400 gallons of coating in EUTOTEREFURB per 12 month rolling time period as determined at the end of each calendar month. **(R 336.1205(3), R 336.1702(a))**
3. The permittee shall not process more than 150,000 gallons of wash solvent in EURECLAIM per 12 month rolling time period as determined at the end of each calendar month. **(R 336.1205(3), R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUTOTECLEAN or EUTOTECLEAN2 unless the associated cover is closed and sealed in accordance with the operation and maintenance plan maintained on site. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUTOTECLEAN and EUTOTECLEAN2 with "lid secure sensor" interlocks that prevent operation if the cover is not properly closed. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

2. The permittee shall not operate EUTOTEREFURB unless the overspray filter is installed, maintained, and operating properly in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1301, R 336.1331)

V. TESTING/SAMPLING

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

NA

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 for FGSUPPORT:
- a) Monthly and 12-month rolling time period records of the amount of cleaning solvent usage, coating usage, and wash solvent processing rates, in gallons.
 - b) The composition of each cleaning solvent, coating, and wash solvent, including the VOC, individual HAP, and total HAP contents.
 - c) Calculations of the monthly and 12-month rolling time period VOC emission rates using the material usage and composition records.
 - d) Calculations of the monthly and 12-month rolling time period VOC emission rates for EUTOTECLEAN2 using the cleaning solvent usage and composition records.

The permittee shall keep the records using approved emission factors or a 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 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)

VII. REPORTING

NA

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. SVREFURB	6	6	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

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

Dust collectors, wet scrubber, and condenser

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	46.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2, SC VI.3	R 336.1205(3)*, R 336.1702(a)
2. Each Individual HAP	Less than 9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2, SC VI.3	R 336.1205(3)
3. Aggregate HAPs	Less than 22 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2, SC VI.3	R 336.1205(3)
* The enforceable restrictions (Rule 205) for VOC emissions are located in: EUPAINT SC II.1; EURESIN SC II.1; EUPAINT2 SC II.1, II.2 & II.3; FGSUPPORT SC II.1.II.2, & II.3.					

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))

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a separate written record for each emission unit of all equipment installations and modifications made to each emission unit. The permittee shall keep all records on file for the life of the equipment and make them available to the Department upon request. **(R 336.1201)**
2. The permittee shall keep a separate written record of the monthly and 12-month rolling time period VOC, individual HAP, and total HAP emission rates from the stationary source. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205(3), R 336.1702(a))**
3. The permittee shall develop, implement, and maintain an approvable operation and maintenance plan for the facility. The plan shall include operating and monitoring parameters and maintenance requirements for air pollution control equipment to ensure the equipment performs properly. **(R 336.1205(3), R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1901)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 61 / 63 Subparts A and CCCCCC, as they apply to FGFACILITY. **(40 CFR Part 61/63 Subparts A & CCCCCC)**

Footnotes:

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