

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

March 28, 2022

PERMIT TO INSTALL
361-06H

ISSUED TO
Almond Products, Inc.

LOCATED AT
17150 148th Avenue
Spring Lake, Michigan 49546

IN THE COUNTY OF
Kent

STATE REGISTRATION NUMBER
N6578

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: March 2, 2022 | |
| DATE PERMIT TO INSTALL APPROVED: March 28, 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 |
|------------------|--|--|-------------------|
| EULINE1 | Comprised of two (2) alkaline cleaning tanks, two (2) rinse tanks, and a surface pretreatment tank (polymer-based solution), followed by a dryer and cool down section, three (3) dry filter primer spray stations, and two (2) dip coating tanks each followed by draining stations, curing ovens, and a cool down section. The dip line tanks and ovens are controlled by a regenerative thermal oxidizer (RTO). | 03-13-2015 / 03-18-2020 | NA |
| EUDIPLINE2 | The paint dip line includes metal surface cleaning/pretreatment operations consisting of a series of tanks containing aqueous cleaning and conditioning solutions followed by two (2) dip coating tanks, which consists of one (1) water-based e-coat tank, one (1) solvent-based paint dip tank, six (6) cure ovens, and non- fugitive enclosure (NFE). | 01-22-2008 / 09-22-2015 / 03-28-2022 | NA |
| EUCOATING | Comprised of four (4) dry filter spray booths and a curing oven. | 01-21-2000 | NA |
| EUANOD/ALOD | Surface treatment process line consisting of multiple tanks in which metal parts are either anodized or alodined. | 12-15-2009 | 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.

EULINE1
EMISSION UNIT CONDITIONS

DESCRIPTION

Comprised of two (2) alkaline cleaning tanks, two (2) rinse tanks, and a surface pretreatment tank (polymer-based solution), followed by a dryer and cool down section, two (2) existing dry filter primer spray stations exhausted to SV-PRIME, three (3) new dry filter primer spray stations not exhausted to SV-PRIME, and two (2) dip coating tanks each followed by draining stations, curing ovens, and a cool down section. The dip line tanks and ovens are controlled by a regenerative thermal oxidizer (RTO). The three new primer spray stations are not allowed to operate until exhausted to SV-PRIME. After installation of the three new primer spray stations, SV-PRIME will be moved from the two existing primer spray stations to the three new primer spray stations. After moving SV-PRIME, the two existing dry filter primer spray stations will no longer be allowed to operate and will be dismantled. The updated description for EULINE1 will be as follows:

Comprised of two (2) alkaline cleaning tanks, two (2) rinse tanks, and a surface pretreatment tank (polymer-based solution), followed by a dryer and cool down section, three (3) dry filter primer spray stations, and two (2) dip coating tanks each followed by draining stations, curing ovens, and a cool down section. The dip line tanks and ovens are controlled by a regenerative thermal oxidizer (RTO).

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Non-fugitive enclosure (NFE). Thermal Oxidizer (RTO) on the dip line tanks and oven. Fabric Filters on the primer spray stations.

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period / Operating Scenario | Equipment | Monitoring / Testing Method | Underlying Applicable Requirements |
|--|-----------------------|--|----------------------------------|------------------------------------|---|
| 1. VOCs | 75.0 tpy | 12-month rolling time period as determined at the end of each calendar month | EULINE1 | SC VI.4 | R 336.1702(a) |
| 2. VOCs | 410.8 lb/day | Calendar day | EULINE1 | SC VI.4 | R 336.1205 |
| 3. VOCs | 7.0 tpy | 12-month rolling time period as determined at the end of each calendar month | Primer spray stations in EULINE1 | SC VI.4 | R 336.1702(a) |
| 4. P-chlorobenzotrifluoride (PCBT, Cas No. 98-56- 6) | 14.9 tpy ¹ | 12-month rolling time period as determined at the end of each calendar month | Primer spray stations in EULINE1 | SC VI.5 | R 336.1224 |

II. MATERIAL LIMIT(S)

| Material | Limit | Time Period / Operating Scenario | Equipment | Monitoring / Testing Method | Underlying Applicable Requirements |
|-----------------------------------|---|----------------------------------|-----------|-----------------------------|------------------------------------|
| 1. VOC content of primer coatings | 3.2 lb/gal (minus water) ^a as applied | Instantaneous | EULINE1 | SC V.1 | R 336.1702(a) |
| 2. VOC content of dip coating | 6.7 lb/gal (minus water) ^a as applied prior to control | Instantaneous | EULINE1 | SC V.1 | R 336.1702(a) |
| 3. Primer coatings | 25.0 gallons/day ¹ | Calendar Day | EULINE1 | SC VI.4 | R 336.1225 |

^a The phrase “minus water” shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compound. **(R 336.1602(4))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials (coatings, reducers, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, reducers, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
3. The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a))**
4. The permittee shall not operate EULINE1 unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

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 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the primer spray stations in EULINE1 unless all respective exhaust filters are installed and operating in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain the primer spray stations in EULINE1 with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**
3. The permittee shall not operate the dip line portions of EULINE1 unless the thermal oxidizer is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 85 percent (by weight) and maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910)**
4. The permittee shall not operate EULINE1 unless the enclosure is installed, maintained, and operated in a satisfactory manner to eliminate fugitive emissions. Satisfactory operation requires that the enclosure is operating at a pressure lower than all adjacent areas so that air flows into the enclosure through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. **(R 336.1205, R 336.1702(a), R 336.1910)**
5. The permittee shall not operate any primer spray station in EULINE1 unless that respective primer spray station is exhausted through SV-PRIME.¹ **(R 336.1225)**

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 336.1205, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. Upon request of the AQD District Supervisor, the permittee shall verify of the destruction efficiency of the dip line and TO portions of EULINE1, by testing at owner's expense, in accordance with Department requirements will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD Technical Programs Unit and the District Office. The final plan must be approved by the AQD prior to testing. Verification of the destruction efficiency of the TO 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 336.1205, R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)**
3. Within 180 days after completion of trial operation of the dip line and oven portions of EULINE1, the permittee shall conduct an initial performance test. Semi-annually after the latest acceptable performance test, the permittee shall verify that the direction of air flow at each natural draft opening (NDO) of the enclosure for EULINE1 is into the enclosure. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to each test date and a complete test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. All test methods, plans, and procedures shall be approved by the AQD prior to testing. After two consecutive tests demonstrate that the direction of air flow at all NDOs is into the enclosure, the permittee may request that the monitoring schedule be revised to a less frequent time period as approved by the District Supervisor. The permittee shall keep records of all verifications of the direction of air flow at the enclosure natural draft openings. All records shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1702(a), R 336.1910, 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 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**
2. The permittee shall monitor, in a satisfactory manner, the temperature in the TO on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (coating, reducer, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**
4. The permittee shall keep the following information for EULINE1:
 - a) Gallons (with water) of each coating, diluent solvent, purge solvent, or cleanup solvent used on a daily basis.
 - b) VOC content (minus water and with water) of each coating, diluent solvent, purge solvent, or cleanup solvent, as applied, on a daily basis.
 - c) Daily usage rate of primer coatings applied in the primer booth sections in gallons per calendar day.
 - d) VOC mass emission calculations determining the daily emission rate in pounds per calendar day.
 - e) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - f) 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 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. **(R 336.1205, R 336.1225, R 336.1702(a))**

5. The permittee shall keep the following information on a monthly basis for the primer spray portions of EULINE1:
 - a) Gallons of each PCBT-containing material used.
 - b) PCBT content of each material, as applied.
 - c) PCBT mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) PCBT 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 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 336.1224)**

6. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the RTO. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**

VII. REPORTING

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. SV-OXIDIZER | 41 | 42 | R 336.1225, 40 CFR 52.21 (c) & (d) |
| 2. SV-PRIME ^a | 24 | 40 | R 336.1225, 40 CFR 52.21 (c) & (d) |
| ^a SV-PRIME will initially provide the exhaust point for only the two existing primer spray stations. After installation of the three new primer spray stations, SV-PRIME will be moved and provide the exhaust point for the three new primer spray stations. The two existing primer spray stations will no longer be exhausted through SV-PRIME after the relocation. | | | |

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

**EUDIPLINE2
 EMISSION UNIT CONDITIONS**

DESCRIPTION

The paint dip line includes metal surface cleaning/pretreatment operations consisting of a series of tanks containing aqueous cleaning and conditioning solutions followed by two (2) dip coating tanks, which consists of one water-based e-coat tank, one solvent-based paint dip tank, and six cure ovens.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Non-fugitive enclosure (NFE)

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period / Operating Scenario | Equipment | Monitoring / Testing Method | Underlying Applicable Requirements |
|------------------------------|---------------|--|------------|-----------------------------|------------------------------------|
| 1. VOCs | 21.8 tpy | 12-month rolling time period as determined at the end of each calendar month | EUDIPLINE2 | SC VI.3 | R 336.1702(a) |
| 2. VOCs | 161.3 lb/day | Calendar day | EUDIPLINE2 | SC VI.4 | R 336.1205(1)(a)(iii) |
| 3. Cumene (CAS No. 98- 82-8) | 1,476.6 lb/yr | 12-month rolling time period as determined at the end of each calendar month | EUDIPLINE2 | SC VI.6 | R 336.1225(1) |

II. MATERIAL LIMIT(S)

| Material | Limit | Time Period / Operating Scenario | Equipment | Monitoring / Testing Method | Underlying Applicable Requirements |
|---------------------------|--|----------------------------------|------------|-----------------------------|------------------------------------|
| 1. VOC content of coating | 3.0 lb/gal (minus water) ^a as applied | Instantaneous | EUDIPLINE2 | SC V.1, SC V.3 | R 336.1702(a) |

^a The phrase "minus water" shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compound. **(R 336.1602(4))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials (coatings, reducers, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, reducers, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1702(a))**

3. The permittee shall not operate EUDIPLINE2 unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

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)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUDIPLINE2 unless the enclosure is installed, maintained, and operated in a satisfactory manner to eliminate fugitive emissions. Satisfactory operation requires that the enclosure is operating at a pressure lower than all adjacent areas so that air flows into the enclosure through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. **(R 336.1205, R 336.1702(a), R 336.1910)**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content, and density of any coating, as 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 336.1205, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. The permittee shall verify that the direction of air flow at each natural draft opening (NDO) of the enclosure for EUDIPLINE2 is into the enclosure on semiannual basis. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to each test date and a complete test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. All test methods, plans, and procedures shall be approved by the AQD prior to testing. After two consecutive tests demonstrate that the direction of air flow at all NDOs is into the enclosure, the permittee may request that the monitoring schedule be revised to a less frequent time period as approved by the District Supervisor. The permittee shall keep records of all verifications of the direction of air flow at the enclosure natural draft openings. All records shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1702(a), R 336.1910, 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 30th 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 maintain a current listing from the manufacturer of the chemical composition of each material (coating, reducer, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for the EUDIPLINE2:
 - a) Gallons (with water) of each coating, diluent solvent, purge solvent or cleanup solvent used.
 - b) VOC content (minus water and with water) of each coating, diluent solvent, purge solvent or cleanup solvent as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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. **(R 336.1205, R 336.1225, R 336.1702(a))**

4. The permittee shall keep the following information on a daily basis for the EUDIPLINE2:
 - a) Gallons (with water) of each coating, diluent solvent, purge solvent or cleanup solvent used.
 - b) VOC content (with water) of each coating, diluent solvent, purge solvent or cleanup solvent as applied.
 - c) VOC mass emission calculations determining the daily emission rate in pounds per calendar day as calculated at the end of each calendar month

The permittee shall keep the 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 336.1224)**

5. The permittee shall keep the following information on a monthly basis for EUDIPLINE2:
 - a) Gallons (with water) of each cumene (CAS No. 98-82-8) containing material used.
 - b) Where applicable, gallons (with water) of each cumene (CAS No. 98-82-8) containing material reclaimed.
 - c) The cumene (CAS No. 98-82-8) content (with water) in % by weight of each material used.
 - d) Cumene (CAS No. 98-82-8) mass emission calculations determining the monthly emission rate in pounds per calendar month.
 - e) Cumene (CAS No. 98-82-8) mass 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 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.¹ **(R 336.1225(1))**

6. The permittee shall keep records of all verifications of the direction of air flow at the enclosure natural draft openings. All records shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1702(a), R 336.1910)**

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 solvent-based coating use in EUDIPLINE2. **(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. SV-DIPLINE2 | 30 | 55 | 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).

**EUCOATING
EMISSION UNIT CONDITIONS**

DESCRIPTION

Comprised of four (4) dry filter spray booths, and a curing oven.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Fabric Filters

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period / Operating Scenario | Equipment | Monitoring / Testing Method | Underlying Applicable Requirements |
|---|--|--|--|------------------------------------|---|
| 1. VOC and exempt solvents combined | 50.0 tpy | 12-month rolling time period as determined at the end of each calendar month | EUCOATING | SC VI.3 | R 336.1702(a) |
| 2. VOC and exempt solvents combined | 1044 lb/day | Calendar day | EUCOATING | SC VI.3 | R 336.1205 |
| 3. Combined Dibasic Esters* | 2.37 tpy | 12-month rolling time period as determined at the end of each calendar month | EUCOATING | SC VI.4 | R 336.1225 |
| 4. VOC | 4.3 lb/gal (minus water) ^a as applied | Daily volume-weighted average | Clear coats used in EUCOATING | SC VI.3 | R 336.1702(d) |
| 5. VOC | 3.5 lb/gal (minus water) ^a as applied | Daily volume-weighted average | Extreme Performance coatings used in EUCOATING | SC VI.3 | R 336.1702(d) |
| ^a The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4)) | | | | | |
| * Dibasic Esters consist of Dimethyl Succinate (CAS No. 106-65-0), Dimethyl Glutarate (CAS No. 119-40-0) and Dimethyl Adipate (CAS No. 627-93-0) combined. | | | | | |

II. MATERIAL LIMIT(S)

1. The VOC content of any other coating type used in EU-COATING shall comply with the limits specified in Rule 336.1621(1)(a) through (g). **(R 336.1702(d))**
2. The permittee shall not use more than 27,000 gallons of tan topcoat F93H107 in EU-COATING per year. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21, 40 CRF 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials (coatings, reducers, cleanup solvents, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, reducers, cleanup

solvents, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**

2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
3. The permittee shall handle all VOC and/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(3), R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUCOATING unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1331, R 336.1910)**
2. The permittee shall equip and maintain EUCOATING with high volume low pressure (HVLP) applicators and air-assisted electrostatic spray guns or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**

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 materials (coatings, reducers, cleanup solvents, etc.), as applied and as received, using federal Reference Test Method 24. Upon prior written 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 336.1205, 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 complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (coatings, reducers, cleanup solvents, etc.), 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. **(R 336.1224, R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a calendar day basis for EUCOATING:
 - a) Gallons (with water) of each coating, catalyst, diluent solvent, additive, purge solvent or cleanup solvent used.
 - b) VOC content (minus water and with water) of each coating, catalyst, diluent solvent, additive, purge solvent or cleanup solvent as applied.
 - c) VOC emission calculations determining the volume-weighted average VOC content of the clearcoat coatings as applied on a calendar day basis.
 - d) VOC emission calculations determining the volume-weighted average VOC content of the extreme performance coatings as applied on a calendar day basis.
 - e) VOC and exempt solvents combined mass emission calculations determining the daily emission rate in pounds per calendar day.
 - f) VOC and exempt solvents combined mass emission calculations determining the monthly emission rate in tons per calendar month.
 - g) VOC and exempt solvents combined 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.
 - h) The total amount (in gallons) of tertiary butyl acetate used per calendar month.

- i) The total amount (in gallons) of tertiary butyl acetate used per 12-month rolling time period as determined at the end of each calendar month.

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

4. The permittee shall keep the following information on a monthly basis for EUACOATING:

- a) Gallons (with water) of each dibasic ester containing material used.
- b) Where applicable, gallons (with water) of each dibasic ester containing material reclaimed.
- c) The dibasic ester content (with water) in pounds per gallon of each material used.
- d) Dibasic ester mass emission calculations determining the monthly emission rate in tons per calendar month.
- e) Dibasic ester mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ **(R 336.1225)**

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.¹ **(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:

| Stack & Vent ID | Maximum Exhaust Diameter / Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|----------------------------|---|---|---|
| 1. SV-BOOTH1 | 36 | 58 | R 336.1225, 40 CFR 52.21 (c) & (d) |
| 2. SV-BOOTH2 | 36 | 58 | R 336.1225, 40 CFR 52.21 (c) & (d) |
| 3. SV-BOOTH3 | 30 | 58 | R 336.1225, 40 CFR 52.21 (c) & (d) |
| 4. SV-BOOTH4 | 30 | 58 | R 336.1225, 40 CFR 52.21 (c) & (d) |
| 5. SV-OVEN | 24 | 30 | 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).

| |
|---|
| EUANOD/ALOD EMISSION UNIT CONDITIONS |
|---|

DESCRIPTION

Surface treatment process line consisting of multiple tanks in which metal parts are either anodized or alodined.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Emissions are controlled by a 25,000-cfm horizontal crossflow fume scrubber.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. 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.¹ **(R 336.1224, R 336.1225)**
2. The permittee shall handle all HAP containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225)**
3. The permittee shall not operate EUANOD/ALOD unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of the fume scrubber, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

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 336.1224, R 336.1225, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUANOD/ALOD unless the fume scrubber is installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1225, 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))

NA

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:

NA

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

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.2 | 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.2 | R 336.1205(3) |
| 3. VOC | Less than 90.0 tpy | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.3 | R 336.1205(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))**

1. The permittee shall determine the HAP content of any material, as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**
2. The permittee shall determine the VOC content, water content, and density of any material (coating, reducer, cleanup solvent, etc.), as applied and as received, using federal Reference Test Method 24. Upon prior written 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 336.1205(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 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3))**
2. The permittee shall keep the following information on 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. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

The permittee shall keep records 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. **(R 336.1205(3))**

3. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each VOC containing material used.
 - b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
 - 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 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. **(R 336.1205(3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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