

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

April 11, 2024

PERMIT TO INSTALL
183-10A

ISSUED TO
International Automotive Components – Port Huron Plant

LOCATED AT
1905 Beard Street
Port Huron, Michigan 48060

IN THE COUNTY OF
St. Clair

STATE REGISTRATION NUMBER
B6625

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 29, 2024	
DATE PERMIT TO INSTALL APPROVED: April 11, 2024	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))	Flexible Group ID
EU-LN0UROCORE	Process Sequence: Roll coater adhesive application on polyurethane foam; application of chopped fiberglass and fabric; compacting/adhesive activation in a heated press; and cutting by water jets.	FG-HEADLINER
EU-LN1UROCORE	Process Sequence: Roll coater adhesive application on polyurethane foam; application of chopped fiberglass and fabric; compacting/adhesive activation in a heated press; and cutting by water jets.	FG-HEADLINER
EU-LN2AZDEL	Azdel Thermo-forming Operation: A prefabricated polypropylene/fiberglass board is heated in an oven; transferred into a mold with fabric; shaped, cooled, and cut. Includes assembly of pre-manufactured parts with hot melt adhesive usage.	FG-HEADLINER
EU-LN3UROCORE	Process Sequence: Roll coater adhesive application on polyurethane foam; application of chopped fiberglass and fabric; compacting/adhesive activation in a heated press; and cutting by water jets.	FG-HEADLINER
EU-LN4UROCORE	Assembly Process: Manual/robotic assembly of pre-manufactured parts. Includes hot melt adhesive usage.	FG-HEADLINER
EU-LN5UROCORE	Assembly Process: Manual/robotic assembly of pre-manufactured parts. Includes hot melt adhesive usage.	FG-HEADLINER
EU-LN6UROCORE	Process Sequence: Roll coater adhesive application on polyurethane foam; application of chopped fiberglass and fabric; compacting/adhesive activation in a heated press; and cutting by water jets.	FG-HEADLINER
EU-LN7UROCORE	Process Sequence: Roll coater adhesive application on polyurethane foam; application of chopped fiberglass and fabric; compacting/adhesive activation in a heated press; and cutting by water jets.	FG-HEADLINER
EU-LN8TRULAM	TRU Lamination: Process uses heat and pressure to laminate TRU board, polyolefin film, and chopped glass with fabric.	FG-HEADLINER
EU-LN9BOXSKIVER	Mechanical process to slice foam buns.	FG-HEADLINER
EU-LN10BOXPOUR	Foam Buns formed by reactive foam process: polyol and isocyanate dispensed into roll-off box; roll-off box moved to curing location.	FG-HEADLINER
EU-LN12AZDELTRU	Process uses heat and pressure to laminate foam slice, polyolefin film, and chopped glass with fabric.	FG-HEADLINER
EU-LN14AZDELTRU	Assembly Process: Manual assembly of pre-manufactured parts. Includes hot melt adhesive usage.	FG-HEADLINER
EU-LN15AZDEL	Process uses heat and pressure to laminate foam slice, polyolefin film, and chopped glass with fabric.	FG-HEADLINER
EU-LN18AZDEL	Assembly Process: Manual assembly of pre-manufactured parts. Includes hot melt adhesive usage.	FG-HEADLINER
EU-ROLLCOATER	Process Sequence: Roll coater adhesive application and drying oven. A cleaner is also utilized in the process.	FG-HEADLINER2

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EU-LAMINATION	Process Sequence: Spray lamination booth and drying tunnel. Emissions are controlled by dry filters.	FG-HEADLINER2
EU-TRIMRING	Process Sequence: Edge Wrap/Trim Ring spray booth.	FG-HEADLINER2

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-HEADLINER	Production emission units associated with interior automotive headliner trim manufacturing.	EU-LN0UROCORE EU-LN1UROCORE EU-LN2AZDEL EU-LN3UROCORE EU-LN4UROCORE EU-LN5UROCORE EU-LN6UROCORE EU-LN7UROCORE EU-LN8TRULAM EU-LN9BOXSKIVER EU-LN10BOXPOUR EU-LN12AZDELTRU EU-LN14AZDELTRU EU-LN15AZDEL EU-LN18AZDEL
FG-HEADLINER2	Production emission units associated with interior automotive headliner trim manufacturing.	EU-ROLLCOATER EU-LAMINATION EU-TRIMRING

**FG-HEADLINER
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Production emission units associated with interior automotive headliner trim manufacturing.

Emission Unit: EU-LN0UROCORE, EU-LN1UROCORE, EU-LN2AZDEL, EU-LN3UROCORE, EU-LN4UROCORE, EU-LN5UROCORE, EU-LN6UROCORE, EU-LN7UROCORE, EU-LN8TRULAM, EU-LN9BOXSKIVER, EU-LN10BOXPOUR, EU-LN12AZDELTRU, EU-LN14AZDELTRU, EU-LN15AZDEL, EU-LN18AZDEL

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	46.4 tpy	12-month rolling time period as determined at the end of each calendar month	FG-HEADLINER	SC VI.3	R 336.1702(a)
2. methylene diphenyl diisocyanate (CAS # 101-68-8)	0.0084 lb/hour	Test Protocol	UROCORE Heated Presses*	SC V.1	R 336.1225
3. methylene diphenyl diisocyanate (CAS # 101-68-8)	0.0064 lb/hour	Test Protocol	Foam Box Pour	SC V.1	R 336.1225

*Limit applies to the five (5) UROCORE Heated Presses combined.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste adhesives, catalysts, other raw materials, and cleaning solvents, and shall store them in a manner to minimize the generation of fugitive emissions which may include the use of closed containers. The permittee shall reclaim or dispose of all waste adhesives, catalysts, other raw materials, and cleaning solvents in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1225, R 336.1702(a))
2. The permittee shall handle all VOC and/or HAP containing materials, including adhesives, catalysts, other raw materials, and cleaning solvents, in a manner to minimize the generation of fugitive emissions. The permittee

shall keep containers of VOC and/or HAP containing raw materials covered at all times except when in process or operator access is necessary. **(R 336.1225, R 336.1702(a), R 336.1901)**

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. Upon the request of the AQD District Supervisor, the permittee shall verify the methylene diphenyl diisocyanate (CAS # 101-68-8), toluene (CAS # 108-88-3), and 1,2-dichloroethane (CAS # 107-06-2) emission rates for the UROCORE heated press operations; and the MDI emission rate for the foam pour box operation by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. The test plan may propose testing of representative process equipment. 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 336.1225, R 336.1702, R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each raw material used, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a calendar month basis for FG-HEADLINER:
 - a) The identity and amount (in pounds) of each non-hot melt adhesive, catalyst, and/or other raw material used listed by each emission unit.
 - b) The MDI content in percent weight of each MDI containing material used. Manufacturer's formulation data for the material can be used to document this information.
 - c) VOC mass emission calculations determining the monthly emission rate for FG-HEADLINER in pounds per calendar month. The methylene diphenyl diisocyanate contribution of VOC for the UROCORE lines shall be determined as specified in Appendix A
 - d) VOC mass emission calculations determining the annual emission rate by emission unit and for FG-HEADLINER in tons per 12-month rolling time period as determined at the end of each calendar month.
 - e) Hours of operation for each emission unit.

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

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-Line0/1	24	40	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-Line2	24	30	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SV-Line3	24	30	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
4. SV-Line6/7	24	40	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
5. SV-Line10	30	30	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 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).

**FG-HEADLINER2
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Production emission units associated with interior automotive headliner trim manufacturing.

Emission Unit: EU-ROLLCOATER, EU-LAMINATION, EU-TRIMRING

POLLUTION CONTROL EQUIPMENT

Dry filters (EU-LAMINATION)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	35.1 tpy	12-month rolling time period as determined at the end of each calendar month	FG-HEADLINER2	SC VI.3	R 336.1702(a)
2. Acetone	3.9 tpy	12-month rolling time period as determined at the end of each calendar month	FG-HEADLINER2	SC VI.4	R 336.1224
3. Methylene diphenyl diisocyanate (101-68-8)	0.58 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FG-HEADLINER2	SC VI.5	R 336.1225(1)
4. Ethyl Benzene (100-41-4)	0.83 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FG-HEADLINER2	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	2.9 lb/gal (minus water) ^a as applied	Daily volume-weighted average	FG-HEADLINER2	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.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste adhesives, catalysts, other raw materials, and cleaning solvents, and shall store them in a manner to minimize the generation of fugitive emissions which may include the use of closed containers. The permittee shall reclaim or dispose of all waste adhesives, catalysts, other raw materials, and cleaning solvents in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1225, R 336.1702(a))**
2. The permittee shall handle all VOC and/or HAP containing materials, including adhesives, catalysts, other raw materials, and cleaning solvents, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers of VOC and/or HAP containing raw materials covered at all times except when in process or operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-LAMINATION unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1331, R 336.1910)**
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 336.1225, R 336.1370)**
3. The permittee shall equip and maintain EU-ROLLCOATER with a roll coater applicator or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**
4. The permittee shall equip and maintain EU-LAMINATION with an HVLP applicator or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**
5. The permittee shall equip and maintain EU-TRIMMING with an HVLP applicator 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 coating, 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 336.1702)**

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 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each raw material used, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702)**

3. The permittee shall keep the following information on a calendar month basis for FG-HEADLINER2:
- The identity and amount (in pounds) of each non-hot melt adhesive, catalyst, and/or other raw material used listed by each emission unit.
 - VOC content (minus water and with water) of each material as applied.
 - VOC emission calculations determining the volume-weighted average VOC content of the materials as applied on a calendar day basis.
 - VOC mass emission calculations determining the monthly emission rate for FG-HEADLINER2 in pounds per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month.
 - VOC mass emission calculations determining the annual emission rate by emission unit and in tons per 12-month rolling time period as determined at the end of each calendar month.

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

4. The permittee shall keep the following information on a calendar month basis for FG-HEADLINER2:
- The identity and amount (in pounds) of each non-hot melt adhesive, catalyst, and/or other raw material used listed by each emission unit.
 - Acetone content of each material as applied.
 - Acetone mass emission calculations determining the monthly emission rate in pounds per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month.
 - Acetone mass emission calculations determining the annual emission rate by emission unit and in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative 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 calendar month basis for FG-HEADLINER2:
- The methylene diphenyl diisocyanate (MDI) content in percent weight of each material as applied. Manufacturer's formulation data for the material can be used to document this information.
 - The emission factor or emission calculation methodology for each raw material used:
 - The American Chemistry Council Center for the Polyurethanes Industry MDI/PMDI Emission Calculator, August 2017, may be used only for MDI emission calculations.
 - Mass balance used for non-MDI VOC emissions.
 - Alternate emission calculation methodology may be used with the approval of the AQD District Supervisor.
 - The MDI mass emission calculations determining the monthly emission rate in pounds per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month.
 - The MDI mass emission calculations determining the annual emission rate by emission unit and in tons per 12-month rolling time period as determined at the end of each calendar month.

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

6. The permittee shall keep the following information on a calendar month basis for FG-HEADLINER2:
- The ethyl benzene content in percent weight of each material as applied. Manufacturer's formulation data for the material can be used to document this information.
 - The ethyl benzene mass emission calculations determining the monthly emission rate in pounds per calendar month and in tons per 12-month rolling time period as determined at the end of each calendar month.

- c) The ethyl benzene mass emission calculations determining the annual emission rate by emission unit and in tons per 12-month rolling time period as determined at the end of each calendar month.

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

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 each emission unit in FG-HEADLINER2. (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-ROLLCOAT1	34	32	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV- ROLLCOAT2	34	32	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-LAMINATE1	20	32	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV- LAMINATE2	20	32	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV-TRIMRING	34	15	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).

FGFACILITY CONDITIONS

DESCRIPTION

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

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)

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 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 336.1205(1)(a)(ii))
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each raw material used, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The

permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**

3. The permittee shall keep the following information on a calendar month basis for FG-FACILITY:
- a) Gallons or pounds of each HAP containing material used.
 - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
 - d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in pounds per calendar month. The methylene diphenyl diisocyanate contribution of HAP emissions for the UROCORE lines shall be determined as specified in FG-HEADLINER Special Condition VI.3 and Appendix A.
 - 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 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(3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart OOOOOO for Flexible Polyurethane Foam Production and Fabrication Area Sources by the initial compliance date. **(40 CFR Part 63, Subpart A and Subpart OOOOOO)**

Footnotes:

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