

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

July 29, 2016

PERMIT TO INSTALL
222-10D

ISSUED TO
Yanfeng Global Automotive Interior Systems

LOCATED AT
5050 Kendrick Street SE
Kentwood, Michigan

IN THE COUNTY OF
Kent

STATE REGISTRATION NUMBER
N1786

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. 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: July 27, 2016	
DATE PERMIT TO INSTALL APPROVED: July 29, 2016	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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 Environmental Quality, 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 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 R 336.1219 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, 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 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 R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

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 (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-PAINTLINE1	An automotive interior plastic parts coating line consisting of two automated coating booths installed in series equipped with robotic HVLP applicators, a flash tunnel, and a single natural gas-fired curing oven. The spray booth emissions are captured by a Non Fugitive Enclosure (NFE) and are controlled by a regenerative thermal oxidizer (RTO). The spray booths are also equipped with dry filter overspray control systems.	2/28/2011 / 9/7/2012 / 3/3/2014/ Permit Issuance Date	FGWIPESOLVENTS, FGFACILITY
EU-TRANSITION1	Operation of EU-PAINTLINE1 during the transition period following permit issuance prior to startup of the RTO. An automotive interior plastic parts coating line consisting of two automated coating booths installed in series equipped with robotic HVLP applicators, a flash tunnel, and a single natural gas-fired curing oven. The spray booths are also equipped with dry filter overspray control systems.		FGWIPESOLVENTS, FGFACILITY
EU-PAINTLINE2	An automotive interior plastic parts coating line consisting of two automated booths installed in series equipped with robotic HVLP applicators, a flash tunnel, and a single natural gas-fired curing oven. The spray booths are equipped with dry filter overspray control systems.	9/7/2012 / 3/3/2014/ Permit Issuance Date	FGWIPESOLVENTS, FGFACILITY
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 336.1290.			

The following conditions apply to: EU-PAINTLINE1

DESCRIPTION: An automotive interior plastic parts coating line consisting of two automated coating booths installed in series equipped with robotic HVLP applicators, a flash tunnel, and a single natural gas-fired curing oven. The spray booths are enclosed by a Non Fugitive Enclosure (NFE) to capture emissions which are controlled by a regenerative thermal oxidizer (RTO). The spray booths are also equipped with dry filter overspray control systems.

Flexible Group ID: FGWIPESOLVENTS, FGFACILITY

POLLUTION CONTROL EQUIPMENT: NFE, RTO and Dry filters within each spray booth

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	20.0 tpy	12-month rolling time period as determined at the end of each calendar month	EU-PAINTLINE1	SC VI.3	R 336.1702(a)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste materials (i.e. coatings, reducers, thinners, cleanup solvents, purge solvents, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1225, 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, R 336.1224, R 336.1225, R 336.1702(a))**

4. The permittee shall not operate EU-PAINTLINE1 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for satisfactory operation of the NFE and the RTO, has been submitted within 60 days after completion of startup of the RTO, and is implemented and maintained. Completion of startup shall be defined as the moment that the RTO receives VOC emissions from the processes. 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 336.1702(a), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate any spray booth associated with EU-PAINTLINE1 unless its respective exhaust filter(s) is installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain each spray booth associated with EU-PAINTLINE1 with robotic 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 any portion of EU-PAINTLINE1 unless the NFE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the NFE is operating at a pressure lower than all adjacent areas, so that air flows into the NFE 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. Satisfactory operation of the NFE is considered equivalent to a VOC capture efficiency of 100 percent. **(R 336.1702(a))**
4. The permittee shall not operate EU-PAINTLINE1 unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a VOC capture efficiency of 100 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), a minimum retention time of 0.5 seconds, and maintaining a minimum temperature of 1450°F in the combustion chamber, or the minimum combustion chamber temperature as measured during the most recent acceptable stack test which achieved a minimum overall destruction efficiency of 95 percent. **(R 336.1205, R 336.1702(a), R 336.1910)**
5. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of EU-PAINTLINE1. **(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 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, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. Within 180 days after completion of start-up of the RTO, verification of the destruction efficiency of the RTO, 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 AQD District Supervisor. The final plan must be approved by the AQD prior to testing. Verification of the destruction efficiency includes the submittal of a complete report of the test results to the AQD within 30 days following the last date of the test. **(R 336.1702(a), R 336.1910)**
3. During the initial capture efficiency performance test of the NFE for EU-PAINTLINE1, which shall be conducted within 180 days of completion of startup of the RTO, and semi-annually thereafter, the permittee shall verify that the direction of air flow at each NDO is into the NFE, using a smoke test (i.e., smoke bomb, smoke tube) or an approved alternate method. The permittee shall notify the AQD District Supervisor in writing at least 15 days before the test is scheduled. No less than 60 days prior to the initial testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and AQD District Supervisor. The AQD must approve the final plan prior to testing. Semi-annual test plans shall be submitted to the AQD District Supervisor for review and approval; however, this requirement may be satisfied by a letter referencing the initial test plan for the NFE as long as the initial test plan was approved. Verification of air flow direction includes the submittal of a complete report of the test results to the AQD District Supervisor within 30 days following the date of the test. After two consecutive tests demonstrate that the direction of air flow at each NDO is into the non-fugitive enclosure, the permittee may submit a request for a change in the testing frequency to the AQD District Supervisor for review and approval. **(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 last 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 maintain a current listing from the manufacturer of the chemical composition of each coating, solvent, 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)**
3. The permittee shall keep the following information on a monthly basis for EU-PAINTLINE1:
 - a) Gallons (with water) of each coating, reducer, catalyst, purge and clean-up solvent, etc. used.
 - b) VOC content (with water) of each coating, reducer, catalyst, as applied and each purge and clean-up solvent as used.
 - 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 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 336.1702(a))**

4. The permittee shall keep, in a satisfactory manner, operating temperature records for the RTO as required by SC IV.5, during operation of the RTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. **(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 the 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 completion of startup of the RTO on EU-PAINTLINE1. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTIONS

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. SVRTO1	58	55	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

1. The permittee shall comply with the requirements of EU-PAINTLINE1 after the RTO for EU-PAINTLINE1 is installed and has completed initial startup. Completion of startup of the RTO shall occur no later than August 31, 2016. Prior to completion of startup of the RTO, the permittee shall follow the requirements specified in this permit under EU-TRANSITION1 for EU-PAINTLINE1. **(R336.1201(3))**

The following conditions apply to: EU-TRANSITION1

DESCRIPTION: Operation of EU-PAINTLINE1 during the transition period. The transition period will take place between the date of issuance of this Permit to Install and the initial startup of the RTO for EU-PAINTLINE1.

Flexible Group ID: FGWIPESOLVENTS, FGFACILITY

POLLUTION CONTROL EQUIPMENT: Dry filters within each spray booth

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	80.0 tpy	12-month rolling time period as determined at the end of each calendar month	EU-TRANSITION1	SC VI.4	R 336.1702(a)
2. VOCs	800.0 lbs/day	Calendar Day	EU-TRANSITION1	SC VI.4	R 336.1205(1)(a)
3. VOCs from air-dried coatings – automobile and truck interior plastic parts ^{b,c}	5.0 lbs/gal (minus water) ^a as applied	Daily volume-weighted average	EU-TRANSITION1	SC VI.4	R 336.1702(a)

^aThe 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))**
^bFor red and black coatings, the emission limitation shall be determined by multiplying the appropriate limit in this table by 1.15.
^cWhen method 24 is used to determine the volatile organic compound content of a coating, the applicable emission limitation shall be determined by adding 0.1 to the appropriate limit in this table.

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste materials (i.e. coatings, reducers, thinners, cleanup solvents, purge solvents, etc) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1225, 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(1), R 336.1224, R 336.1225, R 336.1702(a))**

4. The permittee shall not operate the cure oven portion of EU-TRANSITION1 at a temperature in excess of 194°F. **(R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate either spray booth associated with EU-TRANSITION1 unless its respective exhaust filter(s) is installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain each spray booth associated with EU-TRANSITION1 with robotic 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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the cure oven temperature on a continuous basis. **(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 336.1205, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1702(a))**
2. The permittee shall monitor the curing oven temperature on a continuous basis and record the temperature at least once per shift of operation. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(a))**
3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, solvent, 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)**
4. The permittee shall keep the following information on a calendar day basis for EU-TRANSITION1:
 - a) Gallons (with water) of each material used.
 - b) VOC content (minus water and with water) of each material as applied.
 - c) VOC emission calculations determining the volume-weighted average VOC content of the coatings as applied on a calendar day basis.
 - 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 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 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

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	38	52	R 336.1225 40 CFR 52.21(c) & (d)
2. SV-BOOTH2	38	52	R 336.1225 40 CFR 52.21(c) & (d)
3. SV-Flash Tunnel	10	52	R 336.1225 40 CFR 52.21(c) & (d)
4. SV- Oven	10	52	R 336.1225 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

1. The permittee shall comply with the requirements of EU-TRANSITION1 until the RTO for EU-PAINTLINE1 has been installed and has completed initial startup. Completion of startup of the RTO shall occur no later than August 31, 2016. After August 31, 2016, EU-TRANSITION1 shall no longer be applicable to EU-PAINTLINE1. If the permittee starts operation of the RTO for production prior to August 31, 2016, on and after that date, the permittee shall follow the requirements of EU-PAINTLINE1 and EU-TRANSITION1 shall no longer be applicable. **(R336.1201(3))**

Footnotes:

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

The following conditions apply to: EU-PAINTLINE2

DESCRIPTION: An automotive interior plastic parts coating line consisting of two automated coating booths installed in series equipped with robotic HVLP applicators, a flash tunnel, and a single natural gas-fired curing oven. The spray booths are equipped with dry filter overspray control systems.

Flexible Group ID: FGWIPESOLVENTS, FGFACILITY

POLLUTION CONTROL EQUIPMENT: Dry filters within each spray booth

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	34.0 tpy	12-month rolling time period as determined at the end of each calendar month	EU-PAINTLINE2	SC VI.4	R 336.1702(a)
2. VOCs from air-dried coatings-automobile and interior parts	3.3 lb/gal (minus water) ^a as applied	Daily volume-weighted average	EU-PAINTLINE2	SC VI.4	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))**

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste materials (i.e. coatings, reducers, thinners, cleanup solvents, purge solvents, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
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, R 336.1224, R 336.1702(a))**
4. The permittee shall not operate the cure oven portion of EU-PAINTLINE2 at a temperature in excess of 194°F. **(R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate either spray booth associated with EU-PAINTLINE2 unless its respective exhaust filter(s) is installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain either spray booth associated with EU-PAINTLINE2 with robotic 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 install, calibrate, maintain and operate in a satisfactory manner a device to continuously monitor the curing oven temperature. **(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 material, 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, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1702(a))**
2. The permittee shall monitor the curing oven temperature on a continuous basis and record the temperature at least once per each shift of operation. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(a))**
3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, solvent 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)**
4. The permittee shall keep the following information on a calendar month basis for EU-PAINTLINE2:
 - a) Gallons (with water) of each coating, reducer, catalyst, purge and clean-up solvent, etc. used and reclaimed on a daily basis.
 - b) VOC content (minus water and with water) of each coating, reducer, catalyst, as applied and each purge and clean-up solvent as used.
 - c) VOC emission calculations determining the volume-weighted average VOC content of the coatings as applied on a calendar day basis.
 - d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

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-BOOTH2-1	36	52	R 336.1225 40 CFR 52.21(c) & (d)
2. SV-BOOTH2-2	36	52	R 336.1225 40 CFR 52.21(c) & (d)
3. SV- Oven2	10	52	R 336.1225 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

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
FGWIPESOLVENTS	Parts preparation by manual wiping with a solvent	EU-PAINTLINE1, EU-PAINTLINE2
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	NA

The following conditions apply to: FGWIPESOLVENTS

DESCRIPTION: Parts preparation by manual wiping with a solvent

Emission Units: EU-PAINTLINE1 and EU-PAINTLINE2

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1.VOCs	8.0 tpy	12-month rolling time period as determined at the end of each calendar month	EU-PAINTLINE1, EU-PAINTLINE2	SC VI.3	R 336.1702(a)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

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

IV. DESIGN/EQUIPMENT PARAMETERS

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 VOC content, water content, and density of any material, 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, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/ recordkeeping special condition. **(R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each wipe solvent, 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 calendar month basis for FGWIPESOLVENTS:
 - a) Gallons of each wipe solvent used.
 - b) VOC content of each wipe 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 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 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 10.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(1)
2. Aggregate HAPs	Less than 25.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(1)
3. VOCs	Less than 100.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(1)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(1))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(1))**
2. The permittee shall keep the following information on a calendar month 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 e 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 using mass balance or an acceptable alternate method. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1))**

3. The permittee shall keep the following information on a calendar month 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 emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC 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 using mass balance or an acceptable alternate method. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA