

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

September 12, 2014

**PERMIT TO INSTALL  
113-14**

**ISSUED TO  
TI Automotive, LLC**

**LOCATED AT  
184 Gratiot Boulevard  
Marysville, Michigan**

**IN THE COUNTY OF  
St. Clair**

**STATE REGISTRATION NUMBER  
N5061**

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:

**August 11, 2014**

DATE PERMIT TO INSTALL APPROVED:

**September 12, 2014**

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	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO <sub>2</sub> e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H <sub>2</sub> S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfuction Abatement Plan	NO <sub>x</sub>	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

\* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>	<b>Flexible Group ID</b>
EU-COATINGLINE1	Metal tube coating line 1 consisting of pretreatment via wash stations and a pickling unit, primary coating, and secondary coating including a natural gas fired oven. The pickling unit is controlled by a scrubber and the coating application is controlled by the oven.	FGFACILITY
EU-COATINGLINE2	Metal tube coating line 2 consisting of pretreatment via wash stations and a pickling unit, primary coating, and secondary coating including a natural gas fired oven. The pickling unit is controlled by a scrubber and the coating application is controlled by the oven.	FGFACILITY
EU-COATINGLINE3	Metal tube coating line 3 consisting of pretreatment via wash stations and an acid bath unit; primary coating; pretreatment and secondary coating including a natural gas fired oven, incinerator, and an electric curing oven. The acid bath unit is controlled by a scrubber and the coating application is controlled by the incinerator.	FGFACILITY
EU-COATINGLINE4	Metal tube coating line 4 consisting of pretreatment via wash stations and an acid bath unit; primary coating; pretreatment and secondary coating including a natural gas fired oven, incinerator, and an electric curing oven. The acid bath unit is controlled by a scrubber and the coating application is controlled by the incinerator.	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-COATINGLINE1**

**DESCRIPTION:** Metal tube coating line 1 consisting of pretreatment via wash stations and a pickling unit, primary coating, and secondary coating including a natural gas fired oven.

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** The pickling unit is controlled by a scrubber and the coating application is controlled by the oven.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	1.8 pph	Test Protocol*	EU-COATINGLINE1	GC 13	R 336.1225, R 336.1702(d)
2. VOC	7.9 tpy	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE1	SC VI.4	R 336.1205(3), R 336.1702(d)

\* Test protocol shall specify averaging time

**II. MATERIAL LIMITS**

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Dorriflex G	1 gallon per hour	Monthly average	EU-COATINGLINE1	SC VI.4	R 336.1225, R 336.1702(d)
2. Dorriflex G	8,568 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE1	SC VI.4	R 336.1205(3), R 336.1702(d)
3. PM Acetate	0.40 gallon per hour	Monthly average	EU-COATINGLINE1	SC VI.4	R 336.1225, R 336.1702(d)
4. PM Acetate	1,700 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE1	SC VI.4	R 336.1205(3), R 336.1702(d)

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EU-COATINGLINE1 unless a minimum temperature of 1600°F in the coating oven is maintained. (R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)
2. The exhaust flow of the coating line to the coating oven shall not exceed 50 standard cubic feet per minute. (R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)
3. The permittee shall not operate the pickling portion of EU-COATINGLINE1 unless the scrubbing solution is maintained at a pH level no less than 7.0. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)

4. Within 60 days after commencement of trial operation, the permittee shall submit a preventative maintenance program for the scrubber to be approved by the District Supervisor, Air Quality Division. Following the approval of the preventative maintenance program, applicant shall not operate the scrubber unless the preventative maintenance program has been implemented and is maintained. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall install, calibrate, maintain and operate in accordance with the manufacturer's specifications, a temperature monitoring device in the coating oven. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
2. The permittee shall install, calibrate, maintain and operate, in accordance with the manufacturer's specifications, an encoder which measures the rpm of the 1/2 h.p blower on the inlet to the coating oven. The encoder shall be interlocked with the control system for the coating line and shall automatically disable the line if the blower stops rotating. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
3. The permittee shall not operate the pickling portion of EU-COATINGLINE1 unless the scrubber is installed and operating properly. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
4. The permittee shall not operate the pickling portion of EU-COATINGLINE1 unless a pH control system which monitors the pH of the scrubber solution is installed, calibrated and maintained and operated, in accordance with the manufacturer's specifications, to cease the operation of EU-COATINGLINE1 and disable start-up of EU-COATINGLINE1 until the pH has reached a value greater than 7.0. **(R 336.1205(3), 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))**

1. The permittee shall record, in a satisfactory manner, coating oven inlet blower rpm encoder information using the coating line control system. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
2. The permittee shall record, in a satisfactory manner, the pH of the scrubbing solution using the coating line control system. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
3. 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(3))**
4. The applicant shall keep a monthly record, acceptable to the AQD District Supervisor, of the following information:
  - A. Hours of operation of the coating line.
  - B. The amount of Dorriflex G used, in gallons and the VOC content in pounds per gallon as applied.
  - C. The amount of PM Acetate used, in gallons and the VOC content in pounds per gallon.
  - D. For each coating used:
    - i. The amount in gallons used.
    - ii. The VOC content in pounds per gallon as applied.

- E. VOC emissions calculations determining the total mass emissions in terms of average pounds per day, tons per calendar month and tons per 12-month rolling average mass emission at the end of each calendar month.
- F. The amount in gallons and VOC content of all purge and/or cleanup solvents used and reclaimed.

The permittee shall keep all records shall on file for a period of at least five years and make them available to the Air Quality Division upon request. **(R 336.1205(3), R 336.1225, R 336.1702(d))**

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-1	25	45	R 336.1225, 40 CFR 52.21(c) and (d)

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

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

**The following conditions apply to: EU-COATINGLINE2**

**DESCRIPTION:** Metal tube coating line 2 consisting of pretreatment via wash stations and a pickling unit, primary coating, and secondary coating including a natural gas fired oven.

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** The pickling unit is controlled by a scrubber and the coating application is controlled by the oven.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	1.8 pph	Test Protocol*	EU-COATINGLINE2	GC 13	R 336.1225, R 336.1702(d)
2. VOC	7.9 tpy	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE2	SC VI.4	R 336.1205(3), R 336.1702(d)

\* Test protocol shall specify averaging time

**II. MATERIAL LIMITS**

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Dorriflex G	1 gallon per hour	Monthly average	EU-COATINGLINE2	SC VI.4	R 336.1225, R 336.1702(d)
2. Dorriflex G	8,568 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE2	SC VI.4	R 336.1205(3), R 336.1702(d)
3. PM Acetate	0.40 gallon per hour	Monthly average	EU-COATINGLINE2	SC VI.4	R 336.1225, R 336.1702(d)
4. PM Acetate	1,700 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE2	SC VI.4	R 336.1205(3), R 336.1702(d)

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EU-COATINGLINE2 unless a minimum temperature of 1600°F in the coating oven is maintained. (R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)
2. The exhaust flow of the coating line to the coating oven shall not exceed 50 standard cubic feet per minute. (R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)
3. The permittee shall not operate the pickling portion of EU-COATINGLINE2 unless the scrubbing solution is maintained at a pH level no less than 7.0. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)

4. Within 60 days after commencement of trial operation, the permittee shall submit a preventative maintenance program for the scrubber to be approved by the District Supervisor, Air Quality Division. Following the approval of the preventative maintenance program, applicant shall not operate the scrubber unless the preventative maintenance program has been implemented and is maintained. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall install, calibrate, maintain and operate in accordance with the manufacturer's specifications, a temperature monitoring device in the coating oven. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
2. The permittee shall install, calibrate, maintain and operate, in accordance with the manufacturer's specifications, an encoder which measures the rpm of the 1/2 h.p blower on the inlet to the coating oven. The encoder shall be interlocked with the control system for the coating line and shall automatically disable the line if the blower stops rotating. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
3. The permittee shall not operate the pickling portion of EU-COATINGLINE2 unless the scrubber is installed and operating properly. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
4. The permittee shall not operate the pickling portion of EU-COATINGLINE2 unless a pH control system which monitors the pH of the scrubber solution is installed, calibrated and maintained and operated, in accordance with the manufacturer's specifications, to cease the operation of EU-COATINGLINE2 and disable start-up of EU-COATINGLINE2 until the pH has reached a value greater than 7.0. **(R 336.1205(3), 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))**

1. The permittee shall record, in a satisfactory manner, coating oven inlet blower rpm encoder information using the coating line control system. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
2. The permittee shall record, in a satisfactory manner, the pH of the scrubbing solution using the coating line control system. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
3. 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(3))**
4. The applicant shall keep a monthly record, acceptable to the AQD District Supervisor, of the following information:
  - A. Hours of operation of the coating line.
  - B. The amount of Dorriflex G used, in gallons and the VOC content in pounds per gallon as applied.
  - C. The amount of PM Acetate used, in gallons and the VOC content in pounds per gallon.
  - D. For each coating used:
    - i. The amount in gallons used.
    - ii. The VOC content in pounds per gallon as applied.

- E. VOC emissions calculations determining the total mass emissions in terms of average pounds per day, tons per calendar month and tons per 12-month rolling average mass emission at the end of each calendar month.
- F. The amount in gallons and VOC content of all purge and/or cleanup solvents used and reclaimed.

The permittee shall keep all records shall on file for a period of at least five years and make them available to the Air Quality Division upon request. **(R 336.1205(3), R 336.1225, R 336.1702(d))**

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-2	25	45	R 336.1225, 40 CFR 52.21(c) and (d)

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

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

**The following conditions apply to: EU-COATINGLINE3**

**DESCRIPTION:** Metal tube coating line 3 consisting of pretreatment via wash stations and an acid bath unit; primary coating; pretreatment and secondary coating including a natural gas fired oven, incinerator, and an electric curing oven.

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** The acid bath unit is controlled by a scrubber and the coating application is controlled by the incinerator.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	3.0 pph	Test Protocol*	EU-COATINGLINE3	GC 13	R 336.1225, R 336.1702(d)
2. VOC	13.4 tpy	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE3	SC VI.4	R 336.1205(3), R 336.1702(d)

\* Test protocol shall specify averaging time

**II. MATERIAL LIMITS**

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM Acetate	0.40 gallon per hour	Monthly average	EU-COATINGLINE3	SC VI.4	R 336.1225, R 336.1702(d)
2. PM Acetate	2,315 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE3	SC VI.4	R 336.1205(3), R 336.1702(d)

**III. PROCESS/OPERATIONAL RESTRICTIONS**

- The permittee shall not operate EU-COATINGLINE3 unless the incinerator is installed and operating properly. Proper operation of the incinerator includes maintaining a minimum temperature of 1450°F, a minimum retention time of 0.5 seconds, and a minimum VOC destruction efficiency of 95% by weight. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
- The permittee shall not operate the acid bath unless the scrubbing solution is maintained at a pH level no less than 7.0. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
- Within 60 days after commencement of trial operation, the permittee shall submit a preventative maintenance program for the scrubber to be approved by the District Supervisor, Air Quality Division. Following the approval of the preventative maintenance program, applicant shall not operate the scrubber unless the preventative maintenance program has been implemented and is maintained. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall install, calibrate, maintain and operate in accordance with the manufacturer's specifications, a temperature monitoring device in the incinerator. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
2. The permittee shall install, calibrate, maintain and operate, in accordance with the manufacturer's specifications, an encoder which measures the rpm of the 3 hp blower on the inlet to the incinerator. The encoder shall be interlocked with the control system for the coating line and shall automatically disable the line if the blower stops rotating. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
3. The permittee shall not operate the acid bath unless the scrubber is installed and operating properly. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
4. The permittee shall not operate the acid bath unless a pH control system which monitors the pH of the scrubber solution is installed, calibrated and maintained and operated, in accordance with the manufacturer's specifications, to cease the operation of EU-COATINGLINE3 and disable start-up of EU-COATINGLINE3 until the pH has reached a value greater than 7.0. **(R 336.1205(3), 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))**

1. The permittee shall record, in a satisfactory manner, coating oven inlet blower rpm encoder information using the coating line control system. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
2. The permittee shall record, in a satisfactory manner, the pH of the scrubbing solution using the coating line control system. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
3. 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(3))**
4. The applicant shall keep a monthly record, acceptable to the AQD District Supervisor, of the following information:
  - A. Hours of operation of the coating line.
  - B. The amount of PM Acetate used, in gallons and the VOC content in pounds per gallon.
  - C. For each coating used:
    - i. The amount in gallons used.
    - ii. The VOC content in pounds per gallon as applied.
  - D. The amount in gallons and VOC content of all purge and/or cleanup solvents used and reclaimed.
  - E. VOC emissions calculations determining the total mass emissions in terms of tons per calendar month and tons per 12-month rolling time period.

The permittee shall keep all records shall on file for a period of at least five years and make them available to the Air Quality Division upon request. **(R 336.1205(3), R 336.1225, R 336.1702(d))**

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. EP1	25	45	R 336.1225, 40 CFR 52.21(c) and (d)
2. EP2	8	40	R 336.1225, 40 CFR 52.21(c) and (d)
3. EP3	24	45	R 336.1225, 40 CFR 52.21(c) and (d)

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

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

**The following conditions apply to: EU-COATINGLINE4**

**DESCRIPTION:** Metal tube coating line 4 consisting of pretreatment via wash stations and an acid bath unit; primary coating; pretreatment and secondary coating including a natural gas fired oven, incinerator, and an electric curing oven.

**Flexible Group ID:** FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** The acid bath unit is controlled by a scrubber and the coating application is controlled by the incinerator.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	3.0 pph	Test Protocol*	EU-COATINGLINE4	GC 13	R 336.1225, R 336.1702(d)
2. VOC	13.4 tpy	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE4	SC VI.4	R 336.1205(3), R 336.1702(d)

\* Test protocol shall specify averaging time

**II. MATERIAL LIMITS**

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM Acetate	0.40 gallon per hour	Monthly average	EU-COATINGLINE4	SC VI.4	R 336.1225, R 336.1702(d)
2. PM Acetate	2,315 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-COATINGLINE4	SC VI.4	R 336.1205(3), R 336.1702(d)

**III. PROCESS/OPERATIONAL RESTRICTIONS**

- The permittee shall not operate EU-COATINGLINE4 unless the incinerator is installed and operating properly. Proper operation of the incinerator includes maintaining a minimum temperature of 1450°F and a minimum VOC destruction efficiency of 95% by weight. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
- The permittee shall not operate the acid bath unless the scrubbing solution is maintained at a pH level no less than 7.0. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
- Within 60 days after commencement of trial operation, the permittee shall submit a preventative maintenance program for the scrubber to be approved by the District Supervisor, Air Quality Division. Following the approval of the preventative maintenance program, applicant shall not operate the scrubber unless the preventative maintenance program has been implemented and is maintained. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall install, calibrate, maintain and operate in accordance with the manufacturer's specifications, a temperature monitoring device in the incinerator. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
2. The permittee shall install, calibrate, maintain and operate, in accordance with the manufacturer's specifications, an encoder which measures the rpm of the 3 hp blower on the inlet to the incinerator. The encoder shall be interlocked with the control system for the coating line and shall automatically disable the line if the blower stops rotating. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
3. The permittee shall not operate the acid bath unless the scrubber is installed and operating properly. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
4. The permittee shall not operate the acid bath unless a pH control system which monitors the pH of the scrubber solution is installed, calibrated and maintained and operated, in accordance with the manufacturer's specifications, to cease the operation of EU-COATINGLINE4 and disable start-up of EU-COATINGLINE4 until the pH has reached a value greater than 7.0. **(R 336.1205(3), 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))**

1. The permittee shall record, in a satisfactory manner, coating oven inlet blower rpm encoder information using the coating line control system. **(R 336.1205(3), R 336.1225, R 336.1702(d), R 336.1910)**
2. The permittee shall record, in a satisfactory manner, the pH of the scrubbing solution using the coating line control system. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1910)**
3. 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(3))**
4. The applicant shall keep a monthly record, acceptable to the AQD District Supervisor, of the following information:
  - A. Hours of operation of the coating line.
  - B. The amount of PM Acetate used, in gallons and the VOC content in pounds per gallon.
  - C. For each coating used:
    - i. The amount in gallons used.
    - ii. The VOC content in pounds per gallon as applied.
  - D. The amount in gallons and VOC content of all purge and/or cleanup solvents used and reclaimed.
  - E. VOC emissions calculations determining the total mass emissions in terms of tons per calendar month and tons per 12-month rolling time period.

The permittee shall keep all records shall on file for a period of at least five years and make them available to the Air Quality Division upon request. **(R 336.1205(3), R 336.1225, R 336.1702(d))**

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. EP1	25	45	R 336.1225, 40 CFR 52.21(c) and (d)
2. EP2	8	40	R 336.1225, 40 CFR 52.21(c) and (d)
3. EP3	24	45	R 336.1225, 40 CFR 52.21(c) and (d)

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

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

**FLEXIBLE GROUP SUMMARY TABLE**

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

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

**The following conditions apply Source-Wide to: FGFACILITY**

**POLLUTION CONTROL EQUIPMENT:** All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC	50 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Each individual HAP	8 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
3. Total HAPs	18 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)

**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))

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 last 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 calculate the VOC, individual HAP, and total HAP emission rates from FGFACILITY for each calendar month and 12-month rolling time period, as determined as the end of each calendar month, using mass balance or a method acceptable to the AQD District Supervisor. **(R 336.1205(3))**

**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:

NA

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

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