

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

May 22, 2019

**PERMIT TO INSTALL**  
64-17A

**ISSUED TO**  
Summit Polymers, Inc. – Plant 18

**LOCATED AT**  
5858 East N Avenue  
Kalamazoo, Michigan

**IN THE COUNTY OF**  
Kalamazoo

**STATE REGISTRATION NUMBER**  
P0815

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:<br><b>March 7, 2019</b> |            |
| DATE PERMIT TO INSTALL APPROVED:<br><b>May 22, 2019</b>                          | 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 | Michigan Department of Environmental Quality            |
| 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                              |
| MDEQ                  | Michigan Department of Environmental Quality            |
| 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 <sub>2</sub> 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 <sub>2</sub> S  | Hydrogen Sulfide   |
| kW                | Kilowatt   |
| lb                | Pound  |
| m                 | Meter  |
| mg                | Milligram  |
| mm                | Millimeter   |
| MM                | Million  |
| MW                | Megawatts  |
| NMOC              | Non-Methane Organic Compounds                                    |
| NO <sub>x</sub>   | 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 <sub>2</sub>   | 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 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 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 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 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.

| <b>Emission Unit ID</b> | <b>Emission Unit Description<br/>(Including Process Equipment &amp; Control<br/>Device(s))</b>   | <b>Installation<br/>Date /<br/>Modification Date</b> | <b>Flexible Group ID</b> |
|-------------------------|--|--|--------------------------|
| EUCOATING               | An automotive plastic parts coating line consisting of a flame treat for polypro parts, one primer spray booth followed by a flash off area, a first topcoat spray booth followed by a flash-off area, a second topcoat spray booth followed by a flash-off area, and an electric IR oven. | June 30, 2017  | NA                       |
| EUCOATING2              | An automotive plastic parts coating line consisting of a single booth, flash zone and infrared oven.   | PTI DATE   | NA                       |

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

**EUCOATING  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

An automotive plastic parts coating line consisting of a flame treat for polypro parts, one primer spray booth followed by a flash off area, a first topcoat spray booth followed by a flash-off area, a second topcoat spray booth followed by a flash-off area, and an electric IR oven.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Dry filters on each primer and topcoat spray booth to control particulate matter.

**I. EMISSION LIMIT(S)**

| <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. VOCs  | 88.5 tpy     | 12-month rolling time period as determined at the end of each calendar month | EUCOATING  | SC VI.5                            | R 336.1702(a)                             |
| 2. VOCs, tert-butyl acetate (TBA, CAS No. 540-88-5), acetone (CAS No. 67-64-1), and p-chlorobenzotrifluoride (PCBT, CAS No. 98-56-6), combined | 114.0 tpy    | 12-month rolling time period as determined at the end of each calendar month | Primer spray booth portion of EUCOATING                                | SC VI.5                            | R 336.1224, R 336.1702(a)                 |
| 3. VOCs, TBA (CAS No. 540-88-5), acetone (CAS No. 67-64-1), and PCBT (CAS No. 98-56-6), combined   | 57.0 tpy     | 12-month rolling time period as determined at the end of each calendar month | Topcoat spray booth portions (two total) of EUCOATING, each separately | SC VI.5                            | R 336.1224, R 336.1702(a)                 |
| 4. Ethylbenzene (CAS No. 100-41-4)   | 1.2 tpy      | 12-month rolling time period as determined at the end of each calendar month | EUCOATING  | SC VI.6                            | R 336.1225(1)                             |
| 5. Methyl isobutyl ketone (CAS No. 108-10-1)   | 3.9 tpy      | 12-month rolling time period as determined at the end of each calendar month | EUCOATING  | SC VI.6                            | R 336.1225(1)                             |
| 6. Glycol Ether DB (CAS No. 112-34-5)  | 3.0 tpy      | 12-month rolling time period as determined at the end of each calendar month | EUCOATING  | SC VI.6                            | R 336.1225(1)                             |

| Pollutant   | Limit  | Time Period / Operating Scenario   | Equipment | Testing / Monitoring Method | Underlying Applicable Requirements |
|---|--|--|-----------|-----------------------------|------------------------------------|
| 7. PCBT (CAS No. 98-56-6)   | 108.0 tpy  | 12-month rolling time period as determined at the end of each calendar month | EUCOATING | SC VI.6                     | R 336.1225(1)                      |
| 8. VOCs   | 5.0 lb/gal (minus water) <sup>a</sup> as applied | Daily volume-weighted average.   | EUCOATING | SC VI.4                     | R 336.1702(d)                      |
| <sup>a</sup> 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. <b>(R 336.1602(4))</b> |  |  |           |                             |                                    |

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a))**
4. The permittee shall not operate the cure oven portions of EUCOATING at a temperature in excess of 194°F. **(R 336.1702(d))**
5. The permittee shall burn only natural gas in the flame treat portion of EUCOATING. **(R 336.1224, R 336.1225)**

## IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any primer or topcoat spray booth portion of EUCOATING unless its respective exhaust filters are 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 primer and topcoat spray booth within EUCOATING with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**
3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the cure oven temperature on EUCOATING on a continuous basis. **(R 336.1702(d))**

## **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 336.1225, 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 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall monitor and record the cure oven temperature for EUCOATING on a continuous basis. **(R 336.1702(d))**
3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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 for EUCOATING:
  - a. Gallons (minus water) of each VOC containing material used and, if applicable, reclaimed on a daily basis.
  - b. VOC (minus water) content of each material as applied on a daily basis.
  - c. VOC emission calculations determining the volume-weighted average VOC content of the coatings in pounds per gallon, minus water, as applied on a daily basis.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(d))**

5. The permittee shall keep the following information, each separately, for the primer spray booth portion, each topcoat spray booth portion, and total combined for EUCOATING:
  - a. Gallons (with water) of each VOC, TBA (CAS No. 540-88-5), acetone (CAS No. 67-64-1), and PCBT (CAS No. 98-56-6) containing material used and, if applicable, reclaimed on a monthly basis.
  - b. VOC (with water), TBA, acetone, and PCBT contents of each material as applied on a monthly basis.
  - c. VOC, TBA, acetone, and PCBT mass emission calculations determining the monthly emission rate in tons per calendar month, each separately and combined.
  - 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.
  - e. Combined VOC, TBA, acetone, and PCBT mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

6. The permittee shall keep the following information on a monthly basis for EUACOATING:
- Gallons (with water) of each ethylbenzene (CAS No. 100-41-4), methyl isobutyl ketone (CAS No. 108-10-1), glycol ether DB (CAS No. 112-34-5), and PCBT (CAS No. 98-56-6) containing material used and, if applicable, reclaimed.
  - The ethylbenzene, methyl isobutyl ketone, glycol ether DB, and PCBT contents (with water) in pounds per gallon of each material used.
  - Ethylbenzene, methyl isobutyl ketone, glycol ether DB, and PCBT mass emission calculations determining the monthly emission rate in tons per calendar month, each separately.
  - Ethylbenzene, methyl isobutyl ketone, glycol ether DB, and PCBT mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month, each separately.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> **(R 336.1225)**

7. The permittee shall keep, in a satisfactory manner, continuous records of the cure oven temperature for EUACOATING as required by SC VI.2. Continuous temperature data recording shall consist of instantaneous measurements made at equally spaced intervals, not to exceed 15 minutes per interval. **(R 336.1702(d))**

**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. SVFLAMETREAT*     | 36  | 45                                 | 40 CFR 52.21(c) & (d)                |
| 2. SVPRIMER1         | 42  | 57                                 | R 336.1225,<br>40 CFR 52.21(c) & (d) |
| 3. SVPRIMER2         | 42  | 57                                 | R 336.1225,<br>40 CFR 52.21(c) & (d) |
| 4. SVPRIMERFO        | 24  | 57                                 | R 336.1225,<br>40 CFR 52.21(c) & (d) |
| 5. SVTOPCOAT1        | 42  | 57                                 | R 336.1225,<br>40 CFR 52.21(c) & (d) |
| 6. SVTOPCOAT1FO      | 24  | 57                                 | R 336.1225,<br>40 CFR 52.21(c) & (d) |
| 7. SVTOPCOAT2        | 42  | 57                                 | R 336.1225,<br>40 CFR 52.21(c) & (d) |
| 8. SVTOPCOAT2FO      | 24  | 57                                 | R 336.1225,<br>40 CFR 52.21(c) & (d) |
| * Stack has raincap. |   |                                    |                                      |

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

**EUCOATING2  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

An automotive plastic parts coating line consisting of a single booth, flash zone and infrared oven.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Dry filters to control particulate matter.

**I. EMISSION LIMIT(S)**

| Pollutant  | Limit  | Time Period / Operating Scenario   | Equipment  | Testing / Monitoring Method | Underlying Applicable Requirements |
|--|--|--|------------|-----------------------------|------------------------------------|
| 1. VOCs, tert-butyl acetate (TBA, CAS No. 540-88-5), acetone (CAS No. 67-64-1), and p-chlorobenzotrifluoride (PCBT, CAS No. 98-56-6), combined | 50.0 tpy   | 12-month rolling time period as determined at the end of each calendar month | EUCOATING2 | SC VI.3                     | R 336.1224, R 336.1702(a)          |
| 2. VOCs  | 5.0 lb/gal (minus water) <sup>a</sup> as applied | Daily volume-weighted average.   | EUCOATING2 | SC VI.4                     | R 336.1702(d)                      |

<sup>a</sup> 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 LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

- The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
- 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)**
- The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a))**
- The permittee shall not operate the cure oven of EUCOATING2 at a temperature in excess of 194°F. **(R 336.1702(d))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate EUCOATING2 unless its respective exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain EUCOATING2 with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**
3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the cure oven temperature on EUCOATING2 on a continuous basis. **(R 336.1702(d))**

#### **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 336.1225, 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 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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 for EUCOATING2:
  - a. Gallons (with water) of each VOC, TBA (CAS No. 540-88-5), acetone (CAS No. 67-64-1), and PCBT (CAS No. 98-56-6) containing material used and, if applicable, reclaimed on a monthly basis.
  - b. VOC (with water), TBA, acetone, and PCBT contents of each material as applied on a monthly basis.
  - c. VOC, TBA, acetone, and PCBT mass emission calculations determining the monthly emission rate in tons per calendar month, each separately and combined.
  - d. Combined VOC, TBA, acetone, and PCBT mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1702(a))**

4. The permittee shall keep the following information for EUCOATING2:
  - a. Gallons (minus water) of each VOC containing material used and, if applicable, reclaimed on a daily basis.
  - b. VOC (minus water) content of each material as applied on a daily basis.
  - c. VOC emission calculations determining the volume-weighted average VOC content of the coatings in pounds per gallon, minus water, as applied on a daily basis.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(d))**

5. The permittee shall monitor and keep, in a satisfactory manner, continuous records of the cure oven temperature for EUCOATING2. Continuous temperature data recording shall consist of instantaneous measurements made at equally spaced intervals, not to exceed 15 minutes per interval. **(R 336.1702(d))**

## **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 any portion of EUCOATING2. **(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:

| <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. SVBOOTH2                | 42   | 57  | R 336.1225,<br>40 CFR 52.21(c) & (d)      |
| 2. SVBOOTH2FLASH           | 24   | 57  | R 336.1225,<br>40 CFR 52.21(c) & (d)      |

## **IX. OTHER REQUIREMENT(S)**

NA

### **Footnotes:**

- <sup>1</sup> 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

Dry filters in each spray booth.

#### I. EMISSION LIMIT(S)

| Pollutant              | Limit              | Time Period / Operating Scenario   | Equipment  | Testing / Monitoring Method | Underlying Applicable Requirements |
|------------------------|--------------------|--|------------|-----------------------------|------------------------------------|
| 1. Each Individual HAP | Less than 8.9 tpy  | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.2, SC VI.3            | R 336.1205(3)                      |
| 2. Aggregate HAPs      | Less than 22.4 tpy | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.2, SC VI.3            | R 336.1205(3)                      |
| 3. VOCs                | Less than 89.9 tpy | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.4                     | R 336.1205(3)                      |

#### II. MATERIAL LIMIT(S)

| Material            | Maximum VOC Content, With Water As Applied, in pounds per gallon | Annual Usage Limit                   | Time Period / Operating Scenario   | Equipment  | Testing / Monitoring Method | Underlying Applicable Requirements |
|---------------------|--|--------------------------------------|--|------------|-----------------------------|------------------------------------|
| 1. Group 1 Coatings | 0.0 – 1.28   | 12,145 gallons (with water) per year | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.4                     | R 336.1205(1)(a)                   |
| 2. Group 2 Coatings | 1.29-2.03  | 8,316 gallons (with water) per year  | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.4                     | R 336.1205(1)(a)                   |
| 3. Group 3 Coatings | 2.04-3.4   | 24,251 gallons (with water) per year | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.4                     | R 336.1205(1)(a)                   |

| Material            | Maximum VOC Content, With Water As Applied, in pounds per gallon | Annual Usage Limit                  | Time Period / Operating Scenario   | Equipment  | Testing / Monitoring Method | Underlying Applicable Requirements |
|---------------------|--|-------------------------------------|--|------------|-----------------------------|------------------------------------|
| 4. Group 4 Coatings | 3.41-4.809   | 5,661 gallons (with water) per year | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.4                     | R 336.1205(1)(a)                   |
| 5. Group 5 Coatings | 4.81-5.23  | 6,683 gallons (with water) per year | 12-month rolling time period as determined at the end of each calendar month | FGFACILITY | SC VI.4                     | R 336.1205(1)(a)                   |

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

**V. TESTING/SAMPLING**

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

1. The permittee shall determine the HAP content of any material, as 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(3))**
2. 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(3))**

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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 monthly basis for FGFACILITY:
- Gallons or pounds of each HAP containing material used.
  - Where applicable, gallons or pounds of each HAP containing material reclaimed.
  - HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
  - Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
  - 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.

The permittee shall keep the records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**

4. The permittee shall keep the following information on a monthly basis for FGFACILITY:
- Gallons or pounds of each VOC containing material used and, if applicable, reclaimed.
  - VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
  - Gallons, with water, of each of the following coatings groups used per 12-month rolling time period as determined at the end of each calendar month, each separately:
    - Group 1 Coatings
    - Group 2 Coatings
    - Group 3 Coatings
    - Group 4 Coatings
    - Group 5 coatings
  - VOC emission calculations determining the monthly emission rate in tons per calendar month.
  - 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 using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1)(a), R 336.1205(3))**

## **VII. REPORTING**

NA

## **VIII. STACK/VENT RESTRICTION(S)**

NA

## **IX. OTHER REQUIREMENT(S)**

NA