

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

January 29, 2019

PERMIT TO INSTALL
154-18

ISSUED TO
Precision Coatings, Inc.

LOCATED AT
8120 Goldie Street
Walled Lake, Michigan

IN THE COUNTY OF
Oakland

STATE REGISTRATION NUMBER
A5496

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: October 12, 2018	
DATE PERMIT TO INSTALL APPROVED: January 29, 2019	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 _{2e}	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-LINE1	One web coating line consisting of two coating heads, a laminator, and one four-zone curing oven. The coating heads are used to apply specialty resins dissolved in organic or waterborne solvents to a polyester film substrate. VOC emissions from the web coating heads and the curing oven are captured by using Permanent Total Enclosure (PTE) and controlled by a Regenerative Thermal Oxidizer (RTO) (REECO2).	09-01-1975 / 01-01-1999	FG-WEBCOATING, FG-FACILITY
EU-LINE4	One web coating line consisting of two coating heads, a laminator, and one five-zone curing oven. The coating heads are used to apply specialty resins dissolved in organic or waterborne solvents to a polyester film substrate. VOC emissions from the web coating heads and the curing oven are captured by using PTE and controlled by an RTO (REECO1).	05-05-1979	FG-WEBCOATING, FG-FACILITY
EU-LINE6	One web coating line consisting of two coating heads, a laminator and one four-zone curing oven. The coating heads are used to apply specialty resins dissolved in organic or waterborne solvents to a polyester film substrate. VOC emissions from the web coating heads and the curing oven are captured by using PTE and controlled by an RTO (JZink).	10-13-1984 / 03-09-1992	FG-WEBCOATING, FG-FACILITY
EU-LINE8	One web coating line consisting of one coating head, a laminator, and a curing oven. The coating heads are used to apply specialty resins dissolved in organic or waterborne solvents to a polyester film substrate. VOC emissions from the web coating heads and the curing oven are captured by using PTE and controlled by an RTO (REECO1).	01-10-1996	FG-WEBCOATING, FG-FACILITY
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.			

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-WEBCOATING	Four (4) web coating lines used to apply specialty resins dissolved in organic or waterborne solvents to a polyester film substrate. Each line is equipped with a natural gas-fired oven to cure the coatings. VOC and HAP emissions from each coating head and oven are captured by using PTE and controlled by three RTOs.	EU-LINE1 EU-LINE4 EU-LINE6 EU-LINE8
FG-FACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	NA

The following conditions apply to: FG-WEBCOATING

DESCRIPTION: Four (4) web coating lines used to apply specialty resins dissolved in organic or waterborne solvents to a polyester film substrate. Each line is equipped with a natural gas-fired oven to cure the coatings. VOC and HAP emissions from each coating head and oven are captured by using PTE and controlled by three RTOs.

Emission Units: EU-LINE1, EU-LINE4, EU-LINE6, EU-LINE8

POLLUTION CONTROL EQUIPMENT: VOC emissions from FG-WEBCOATING are captured by using a Permanent Total Enclosure (PTE) and abated via three Regenerative Thermal Oxidizer (RTO).

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	84.0 tpy	12-month rolling time period as determined at the end of each calendar month	FG-WEBCOATING	SC VI.3	R 336.1205, R 336.1225 R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste coatings, reducers, purge solvents and clean-up solvents (materials) and shall store them in closed containers. The permittee shall dispose of all waste coatings in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1702(a))**
2. The permittee shall not operate any coating line in FG-WEBCOATING unless a capture system that satisfies the requirements of PTE according to US EPA Reference Method 204 of 40 CFR, Part 51, Appendix M is installed, maintained and operated in a satisfactory manner. Proper operation includes each VOC capture room (system) being maintained at a lower absolute ambient pressure relative to the surroundings. **(R 336.1205, R 336.1910, R 336.1702(a))**
3. The permittee shall not operate any coating line in FG-WEBCOATING unless a visible and audible alarm system and an automatic coating process shut-off system is installed, maintained and operated in a satisfactory manner. Proper operation includes the alarm and shut-off systems being activated if the solvent stream exceeds the maximum VOC loading or if the RTO temperature falls below the required minimum operating temperature threshold specified in FG-WEBCOATING special condition IV.1. **(R 336.1225, R 336.1702, R 336.1910)**
4. The emissions from EU-LINE1, EU-LINE4, EU-LINE6, and EU-LINE8 shall not bypass the coating lines' associated RTO unless a fire and/or explosion hazard warrants it. **(R 336.1225, R 336.1702, R 336.1910)**

5. The permittee shall not operate FG-WEBCOATING unless a malfunction abatement plan (MAP) as described in Rule 911(2), for each RTO, PTE, and automatic shut-off system has been submitted within 90 days of permit issuance and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**

6. 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))**
7. The permittee shall either maintain a minimum of negative 0.007 inches or less of water pressure differential between the PTE and the adjacent area on a continuous basis or maintain a facial velocity of 200 feet per minute through each natural draft opening of the PTE on a continuous basis. **(R 336.1205, R 336.1702(a), R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any coating line in FG-WEBCOATING (including clean-up times using organic solvents) unless emissions from the coating line are routed to an RTO which is installed and operating properly. In accordance with the table below, proper operation of each of the three RTOs includes maintaining the associated minimum temperature, minimum retention time, and minimum overall VOC control efficiency (combined capture and destruction efficiency). However, if a stack test is performed to demonstrate that the required overall control efficiency is achieved, the minimum temperature as determined during the most recent acceptable stack test for each RTO shall be maintained. **(R 336.1205(1)(a), R 336.1910, R 336.1702(a))**

RTO Designation	RTO Name	Minimum Operating Temperature, Degrees Fahrenheit	Minimum Retention Time, Seconds	Minimum Overall Control Efficiency (Combined Capture and Destruction Efficiency), Percent (%)
1	Reeco1	1500 (815.6 °C)	1.0	90.0
2	Reeco2	1500 (815.6 °C)	0.45	92.5
3	J. Zink	1600 (871.1 °C)	2.0	90.25

2. 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 FG-WEBCOATING. Each temperature measurement device shall be installed immediately after the combustion zone and shall have an accuracy of greater of ± 1.0 percent of the temperature being measured expressed in degrees Celsius or ± 1.0 °C. **(R 336.1225, R 336.1702(a), R 336.1910)**

3. The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, a device to measure the average facial velocity of air or a device to monitor the pressure differential between the PTE for FG-WEBCOATING and the adjacent area on a continuous basis during operation of any portion of FG-WEBCOATING. In lieu of calibration, replacement of a measurement device with a new measurement device is acceptable. **(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. VOC content of all coatings, as applied and as received, shall be tested using US EPA Reference Method 24 (EPA RM 24) or other EPA approved method. **(R 336.1702(a), R 336.1001, R 336.2003, R 336.2004, R 336.2040(5))**

OR

VOC content, water content, density of any coating, reducer and purge and clean-up solvents may be determined using manufacturer's formulation data. A manufacturer must send a certified (in accordance with Clean Air Act) formulation data with each batch of product. VOC content of a blended coating may be determined using VOC content of its constituents. If the permittee elects to use formulation data, the following conditions apply: **(R 336.1702(a), R 336.1001, R 336.2003, R 336.2004, R 336.2040(5))**

- a) At least three (3) frequently used coatings shall be tested randomly using the US EPA Reference Method 24 (EPA RM 24) once in each calendar year. Effort shall be made to test a coating that is least recently tested.
 - b) At least two (2) additional random coatings shall be tested using the EPA RM 24 once each calendar year. Effort shall be made to test a coating that is least recently tested.
 - c) All EPA RM 24 analyses shall be completed by December 15 of each calendar year. All formulation VOC contents versus EPA RM24 VOC contents shall be tabulated by the end of each calendar year.
 - d) If the EPA Reference Method 24 and formulation data values differ, then the EPA RM 24 results shall be used to determine compliance.
 - e) All solvent, coating and blending information (initial VOC & HAP content, density of each blending component, blending ratios or proportions) along with final composition (final VOC and HAP content) shall be kept on file.
 - f) The Air Quality Division reserves the right to require HAP (hazardous air pollutants) formulation data to be verified using the EPA Test Method 311.
2. Upon request of the AQD District Supervisor, the permittee shall determine the Capture Efficiency (CE) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910, R 336.2001, R 336.2003, R 336.2004)**
 3. Within 90 calendar days of reconfiguration of the web coating lines and RTO configuration (or RTO set-up), the permittee shall determine the Capture Efficiency (CE) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910, R 336.2001, R 336.2003, R 336.2004)**

4. Upon request of the AQD District Supervisor, the permittee shall verify the Destruction Efficiency (DE) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR, Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test and Overall Control Efficiency (OCE) within 90 calendar days of reconfiguration of the web coating lines and RTO set-up. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910, R 336.2001, R 336.2003, R 336.2004)**
5. Within 90 calendar days of reconfiguration of the web coating lines and RTO configuration (or RTO set-up), the permittee shall verify the Destruction Efficiency (DE) by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR, Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test and Overall Control Efficiency (OCE) within 90 calendar days of reconfiguration of the web coating lines and RTO set-up. **(R 336.1205, R 336.1225, R 336.1702, 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 336.1225, R 336.1702(a))**
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 used within FG-WEBCOATING. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a calendar month basis for FG-WEBCOATING:
 - a) Hours of operation of each coating line and hours of operation of its associated RTO
 - b) Pounds or kilograms (kg) (with water) of each paint, coating, reducer, purge and clean-up solvent, *etc.* (material) used and reclaimed.
 - c) VOC content (with water) of each material as applied.
 - 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 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(a))**

4. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of each RTO on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. Continuous 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 336.1205, R 336.1225, R 336.1702)**

5. The permittee shall monitor, in a satisfactory manner, the air flow or pressure differential between the PTE for FG-WEBCOATING and the adjacent area on a continuous basis to verify that air is entering the PTE. The air flow or pressure differential data recording shall consist of measurements made once per week for two consecutive months. After eight consecutive weekly readings of negative 0.007 inches or less, data recording can be reduced to once per month, unless a deviation is recorded. If a deviation is recorded, the permittee shall keep a record of the date, time, reason, and corrective action taken for the deviation. Measurements shall be recorded once per week after each deviation, for a minimum eight consecutive readings of negative 0.007 inches or less. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702)**
6. The permittee shall keep records on file of all inspections, maintenance activities, malfunctions, and repairs for each RTO, PTE, and automatic shut-off system to demonstrate compliance with the MAP (SC III.5). The record shall be kept in a format acceptable to the AQD District Supervisor and shall be made available to the Department upon request. **(R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**
7. The permittee shall keep the following records for any reconfiguration of the web coating lines and/or RTOs:
 - a) The date the reconfiguration took place
 - b) Performance test results
 - c) Certification from a qualified technician that automatic shut-off systems work properly**(R 336.1225, R 336.1702, R 336.1901, R 336.1910)**
8. The permittee shall record each occurrence an RTO bypass line was open during operation of the associated coating line and the length of time the bypass was open. Records shall be kept on file and made available to the Department upon request. **(R 336.1702, R 336.1910)**

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 and Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-REECO1 (RTO 1)	36.0	60.0	R 336.225, 40 CFR 52.21 Subparts (c) & (d)
2. SV-REECO2 (RTO 2)	45.0	31.5	R 336.225, 40 CFR 52.21 Subparts (c) & (d)
3. SV-JZINK (RTO 3)	36.0	35.0	R 336.225, 40 CFR 52.21 Subparts (c) & (d)

IX. OTHER REQUIREMENT(S)

1. Within 15 calendar days of reconfiguring the coating lines RTO set-up, the permittee shall notify the Southeast Michigan District Supervisor, Air Quality Division, in writing that the reconfiguration has taken place. As a minimum, the notification must include the date reconfiguration took place; a listing of which web coating lines are now exhausted to which RTO; and a date by which the permittee will submit the performance test plan pursuant to V.TESTING/SAMPLING. **(R 336.1702(a))**

The following conditions apply Source-Wide to: FG-FACILITY

DESCRIPTION : All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

I. EMISSION LIMITS

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

1. The permittee shall determine the HAP content of any material as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**

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 keep the following information on a calendar month basis for FG-FACILITY:
 - a) Pounds or kilograms (kg) (with water) of each HAP containing paint, coating, reducer, purge and clean-up solvent, etc. (material) used.

- b) Where applicable, pounds or kilograms (kg) of each HAP containing material reclaimed.
- c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

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))**

3. The permittee shall keep the following information on a calendar month basis for FG-FACILITY:
- a) Pounds or kilograms (kg) (with water) of each paint, coating, reducer, purge and clean-up solvent, *etc.* (material) used and reclaimed.
 - b) VOC content (with water) of each material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

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

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subparts A-General Provisions and ZZZZ-National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. **(40 CFR Part 63 Subparts A and ZZZZ)**