

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

December 2, 2022

**PERMIT TO INSTALL**  
158-22

**ISSUED TO**  
Romeo RIM, Inc.

**LOCATED AT**  
74000 Van Dyke Avenue  
Romeo, Michigan 48065

**IN THE COUNTY OF**  
Macomb

**STATE REGISTRATION NUMBER**  
B5854

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: <b>November 12, 2022</b>	
DATE PERMIT TO INSTALL APPROVED: <b>December 2, 2022</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/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

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

### POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO <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 Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

## EMISSION UNIT SPECIAL CONDITIONS

### EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EU-PLT1-IMP26	Plant 1 - Clamp No. 26 (LFI-1) - A 125 ton Cincinnati (North) Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	12-16-1994	FG-PLT1-RIM-IMP, FG-MACT-SUBPART_PPPP
EU-PLT1-IMP28	Plant 1 - Clamp No. 28 (LFI-2) - A 125 ton Cincinnati (South) Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	12-28-1994	FG-PLT1-RIM-IMP, FG-MACT-SUBPART_PPPP
EU-PLT1-IMP51	Plant 1 - Clamp No. 51 (BBG-1) - A Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	04-06-2020	FG-PLT1-RIM-IMP, FG-MACT-SUBPART_PPPP
EU-PLT1-IMP52	Plant 1 - Clamp No. 52 (BBG-2) - A Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	04-06-2022	FG-PLT1-RIM-IMP, FG-MACT-SUBPART_PPPP
EU-PLT1-IMP53	Plant 1 - Clamp No. 53 (BBG-3) - A Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	TBD	FG-PLT1-RIM-IMP, FG-MACT-SUBPART_PPPP
EU-PLT1-IMP54	Plant 1 - Clamp No. 54 (BBG-4) - A Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	TBD	FG-PLT1-RIM-IMP, FG-MACT-SUBPART_PPPP

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

## FLEXIBLE GROUP SPECIAL CONDITIONS

### FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-PLT1-RIM-IMP	Plant 1 - Reaction Injection Molding (RIM) Process with mold release and in-mold painting (Clamp numbers 26, 28, 51, 52, 53, and 54) with one paint and mold release mix room and one storage room.	EU-PLT1-IMP26, EU-PLT1-IMP28, EU-PLT1-IMP51, EU-PLT1-IMP52, EU-PLT1-IMP53, EU-PLT1-IMP54
FG-MACT-SUBPART_PPPP	<p>All equipment at the stationary source including R 336.1201 exempt equipment involved in surface coating of plastics parts and products that meet the requirements in 40 CFR 63.4481 of 40 CFR 63, Subpart PPPP. Collectively, these plastic parts coating lines comprise the affected source that is subject to the National Emission Standards for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP) Maximum Achievable Control Technology Standards (MACT). This flexible group qualifies as an existing affected source for the purpose of the Subpart PPPP MACT.</p> <p>All coating operations as defined in 40 CFR 63.448; all storage containers and mixing vessels in which coatings, thinners, and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers, used for conveying waste materials generated by a coating operation are part of the Subpart PPPP MACT source category.</p>	EU-PLT2-LINE1, EU-PLT1-LINE1, EU-PLT1-LINE2, EU-PLT1-IMP26, EU-PLT1-IMP28, EU-PLT1-IMP51, EU-PLT1-IMP52, EU-PLT1-IMP53, EU-PLT1-IMP54, EU-PLT2-RIM42, EU-PLT2-RIM43, EU-PLT2-RIM44, EU-CLEANUP, EU-PLT2-RIM45, EUMOLDRELEASE, EUCLAMPBOOTH1, EUCLAMPBOOTH2, EUPAINTKITCHEN, EUFINISHING, EUPARTSWIPE, EULINECLEANING, EUOTPAINTKITCHEN, EUOTLINECLEANING, EUOTARYPAINT, EUOTARYBC, EUOTFINISHING, EUOTPARTSWIPE, EUSPACOATING

**FG-PLT1-RIM-IMP  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Plant 1 - Reaction Injection Molding (RIM) Process with mold release and in-mold painting (Clamp numbers 26, 28, 51, 52, 53, and 54) with one paint and mold release mix room and one storage room.

**Emission Unit:** EU-PLT1-IMP26, EU-PLT1-IMP28, EU-PLT1-IMP51, EU-PLT1-IMP52, EU-PLT1-IMP53, EU-PLT1-IMP54

**POLLUTION CONTROL EQUIPMENT**

Fabric Filters when using mold painting in RIM presses

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. VOCs	42.25 lbs per hour	Hourly based on total monthly hours of operation	FG-PLT1-RIM-IMP	SC VI.3	R 336.1702(a)
2. VOCs	69.06 tpy	12-month rolling time period as determined at the end of each calendar month	FG-PLT1-RIM-IMP	SC VI.3	R 336.1702(a)
3. VOCs	34.4 tpy	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP51 & EU-PLT1-IMP52 combined	SC VI.4	R 336.1205(3), R 336.1702(a)
4. VOCs	35.9 tpy	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP53 & EU-PLT1-IMP54 combined	SC VI.5	R 336.1205(3), R 336.1702(a)
5. Acetone (CAS No. 67-64-1)	5.6 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP53 & EU-PLT1-IMP54 combined	SC VI.5	R 336.1224

**II. MATERIAL LIMIT(S)**

<b>Material</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC content of the coatings	As specified in R 336.1632(20), Table 66	Pound VOC per gallon of coating (minus water) <sup>a</sup> as applied (instantaneous)	EU-PLT1-IMP26, EU-PLT1-IMP28,	SC V.1, SC VI.3, SC VI.9	R 336.1702(d)
2. VOCs	4.6 lb/gal (minus water) <sup>a</sup> as applied	Instantaneous	EU-PLT1-IMP51, EU-PLT1-IMP52	SC V.1, SC VI.4, SC VI.9	R 336.1702(a)
3. Coatings	12,141 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP51 & EU-PLT1-IMP52 combined	SC VI.4	R 336.1205(3)
4. Mold Releases	7,884 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP51 & EU-PLT1-IMP52 combined	SC VI.4	R 336.1205(3)
5. VOCs	4.6 lb/gal (minus water) <sup>a</sup> as applied	Instantaneous	EU-PLT1-IMP53, EU-PLT1-IMP54, each separately	SC V.1, SC VI.5, SC VI.9	R 336.1702(a)
6. Coatings	12,649 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP53 & EU-PLT1-IMP54 combined	SC VI.5	R 336.1205(3)
7. Mold Releases	4,550 gallons per year	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP53 & EU-PLT1-IMP54 combined	SC VI.5	R 336.1205(3)

<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 compounds. **(R 336.1602(4))**

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

1. The permittee shall not use in-mold painting in any of the RIM presses in FG-PLT1-RIM-IMP unless all exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1331, R 336.1910)**

**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 conduct random testing of non-waterborne coatings, as applied, for the VOC content, solids content and density, using federal Reference Test Method 24 or EPA approved reference method, on a yearly basis with all coatings tested within a five-year period. **(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 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, 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 used in FG-PLT1-RIM-IMP, including the weight percent of each component. 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 at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702)**
3. The permittee shall keep a separate record of the following for each calendar month: **(R 336.1702)**
  - a) Usage rate of each material used in FG-PLT1-RIM-IMP
  - b) Hours of operation of FG-PLT1-RIM-IMP
  - c) Chemical composition of each material used in FG-PLT1-RIM-IMP including VOC content, in pounds of VOC per gallon, of material used (as applied)
  - d) VOC mass emission calculations verifying an average hourly emission rate based on the total monthly hours of operation
  - 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.
4. The permittee shall keep a record of the following for EU-PLT1-IMP51 and EU-PLT1-IMP52, separately and combined, for each calendar month: **(R 336.1205, R 336.1702)**
  - a) Usage rate of each material used
  - b) Chemical composition of each material used, including VOC content in pounds of VOC per gallon (minus water and with water) as applied, of material used
  - c) Usage rate of coatings and mold releases, each separately, in gallons per 12-month rolling time period as determined at the end of each 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.
5. The permittee shall keep a record of the following for EU-PLT1-IMP53 and EU-PLT1-IMP54, separately and combined, for each calendar month: **(R 336.1205, R 336.1224, R 336.1702)**
  - a) Usage rate of each material used
  - b) Chemical composition of each material used, including VOC content in pounds of VOC per gallon (minus water and with water) as applied, of material used
  - c) Acetone content, in pounds per pound, of each material used
  - d) Usage rate of coatings and mold releases, each separately, in gallons per 12-month rolling time period as determined at the end of each 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.
  - f) Acetone 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.
6. The permittee shall monitor and replace exhaust filters in FG-PLT1-RIM-IMP pursuant to the schedule outlined in Appendix 3.2 of the stationary source's ROP. **(R 336.1910)**
7. The permittee shall record the condition of the exhaust filters on a daily basis using an approved format pursuant to Appendix 4 of the stationary source's ROP. **(R 336.1910)**
8. The permittee shall monitor and record the total monthly hours of operation of the FG-PLT1-RIM-IMP. **(R 336.1910)**

9. The permittee shall indicate the date of the testing and which coatings were randomly tested as required in SC V.1. The permittee shall keep records of the test results. **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

**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 for each of EU-PLT1-IMP53 and EU-PLT1-IMP54. **(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. SV-026 (RIM 26)	24 <sup>1</sup>	43 <sup>1</sup>	R 336.1225
2. SV-028 (RIM 28)	24 <sup>1</sup>	43 <sup>1</sup>	R 336.1225
3. SV-PLT-IMP51 (RIM 51)	36 <sup>1</sup>	45 <sup>1</sup>	R 336.1225
4. SV-PLT-IMP52 (RIM 52)	36 <sup>1</sup>	45 <sup>1</sup>	R 336.1225
5. SV-PLT1-IMP53 (RIM 53)	36	45	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV-PLT1-IMP54 (RIM 54)	36	45	R 336.1225, 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products by the initial compliance date. **(40 CFR Part 63, Subpart A and Subpart PPPP)**

**Footnotes:**

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

**FG-MACT-SUBPART\_PPPP  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Each new, reconstructed, and existing affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.

**Emission Unit:** EU-PLT2-LINE1, EU-PLT1-LINE1, EU-PLT1-LINE2, EU-PLT1-IMP26, EU-PLT1-IMP28, EU-PLT1-IMP51, EU-PLT1-IMP52, EU-PLT1-IMP53, EU-PLT1-IMP54, EU-PLT2-RIM42, EU-PLT2-RIM43, EU-PLT2-RIM44, EU-CLEANUP, EU-PLT2-RIM45, EUMOLDRELEASE, EUCLAMPBOOTH1, EUCLAMPBOOTH2, EUPAINTKITCHEN, EUFINISHING, EUPARTSWIPE, EULINECLEANING, EUOTPAINTKITCHEN, EUOTLINECLEANING, EUOTARYPAINT, EUOTARYBC, EUOTFINISHING, EUOTPARTSWIPE, EUSPACOATING

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. Organic HAP	0.16 lb per lb of coating solids	12-month rolling time period as determined at the end of each calendar month.	New or Reconstructed - General Use Coating	SC V.1, SC VI.1 through VI.5	40 CFR 63.4490(a)(1)
2. Organic HAP	0.16 lb per lb of coating solids	12-month rolling time period as determined at the end of each calendar month.	Existing - General Use Coating	SC V.1, SC VI.1 through VI.5	40 CFR 63.4490(b)(1)

3. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.4490 using at least one of the following three options, which are listed in 40 CFR 63.4491(a) through (c):
  - a) Compliant material option,
  - b) Emission rate without add-on controls option, or
  - c) Emission rate with add-on controls option.

The permittee shall include all coatings, thinners and/or other additives, and cleaning materials used when determining the emission rate. **(40 CFR 63.4491)**

4. Any coating operation(s) using the compliant material option, the emission rate without add-on controls option, or the emission rate with add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.4490 at all times. **(40 CFR 63.4500(a)(1), 40 CFR 63.4500(a)(2)(i))**
5. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.4490(a) or (b), the permittee may comply separately with each subcategory emission limit or comply using one of the alternatives in 40 CFR 63.4490(c)(1) or (2). **(40 CFR 63.4490(c))**

**II. MATERIAL LIMIT(S)**

For the compliant materials option, the permittee shall meet the material limits specified in the following table.

<b>Material</b>	<b>Limit</b>	<b>Time Period/Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring/ Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. Each Thinner and/or Additive	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, SC VI.2, SC VI.3, SC VI.4	<b>40 CFR 63.4491(a)</b>
2. Each Cleaning Material	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, SC VI.2, SC VI.3, SC VI.4	<b>40 CFR 63.4491(a)</b>

\* Determined according to 40 CFR 63.4541(a).

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

- At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.4500(b))**

**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))**

- The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the organic HAP content of each coating used in accordance with 40 CFR 63.4541, 40 CFR 63.4551, and/or 40 CFR 63.4561. **(40 CFR 63.4541, 40 CFR 63.4551, 40 CFR 63.4561)**

**VI. MONITORING/RECORDKEEPING**

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

- The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.4541, 40 CFR 63.4551, or 40 CFR 63.4561. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4483 and ends on the last day of the 12<sup>th</sup> month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months. **(40 CFR 63.4483, 40 CFR 63.4540, 40 CFR 63.4550, 40 CFR 63.4560)**
- The permittee shall keep all records required by 40 CFR 63.4530 in the format and timeframes outlined in 40 CFR 63.4531. **(40 CFR 63.4542(d), 40 CFR 63.4552(d), 40 CFR 63.4563(j))**
- The permittee shall maintain, at a minimum, the following records for each compliance period:
  - A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart PPPP, and the documentation supporting each notification report. **(40 CFR 63.4530(a))**
  - A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. **(40 CFR 63.4530(b))**
  - A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.4530(c)(1))**

- d) For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. **(40 CFR 63.4530(c)(2))**
  - e) For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. **(40 CFR 63.4530(c)(3))**
  - f) The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. **(40 CFR 63.4530(d))**
  - g) The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period. **(40 CFR 63.4530(e))**
  - h) The mass fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.4530(f))**
  - i) The information specified in 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4). **(40 CFR 63.4530(g))**
  - j) For each deviation from an emission limitation reported under 40 CFR 63.4520(a)(5) through (7), a record of the information specified in 40 CFR 63.4530(h)(1) through (4), as applicable. **(40 CFR 63.4530(h))**
4. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, using Equation 1 of 40 CFR 63.4541. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.4541(a). **(40 CFR 63.4542(a))**
  5. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, according to 40 CFR 63.4551(a) through (g). **(40 CFR 63.4552(a))**

## **VII. REPORTING**

1. For the compliant material option, the permittee shall report a deviation, as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5), for the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a). **(40 CFR 63.4542(b))**
2. For the emission rate without add-on controls, the permittee shall report a deviation, as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6), if the organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490. **(40 CFR 63.4552(b))**
3. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.4510. **(40 CFR Part 63, Subparts A and PPPP)**
4. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating operations were in compliance. **(40 CFR 63.4520(a), 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f))**
5. The permittee must submit the following:
  - a) Initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in 40 CFR 63.9(h) and 40 CFR 63.4510(c) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF). The applicable

notification must be submitted by the deadline specified in this subpart, regardless of the method in which the reports are submitted. **(40 CFR 63.4520(e))**

- b) On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for 1-year, whichever date is later, the semiannual compliance report required in 40 CFR 63.4520(a) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year begin submitting all subsequent reports via CEDRI. **(40 CFR 63.4520(f))**

### **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:

NA

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

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP for Surface Coating of Plastic Parts and Products. **(40 CFR Part 63, Subparts A and PPPP)**

#### **Footnotes:**

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