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

November 26, 2024

PERMIT TO INSTALL
135-24

ISSUED TO
Hutchinson Antivibration Systems, Inc.

LOCATED AT
600 Seventh Street
Cadillac, Michigan 49601

IN THE COUNTY OF
Wexford

STATE REGISTRATION NUMBER
A9364

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: **October 4, 2024**	
DATE PERMIT TO INSTALL APPROVED: **November 26, 2024**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

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_2e	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_2S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO_x	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_2	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 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.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUAUTODIP	Automatic dip system for applying cement to metal and plastic parts. Process also includes conveyor system for drying the dipped parts. The cements are dried by an electric dryer. VOC emissions from this line are controlled by a Regenerative Thermal Oxidizer.	05-01-2013 05-04-2015	FGAUTODIP FGRTO FGMACTMMMM
EUAUTODIP2	Automatic dip system number 2 for applying cement to metal and plastic parts. Process also includes conveyor system for drying the dipped parts. The cements are dried by an electric dryer. VOC emissions from this line are controlled by a Regenerative Thermal Oxidizer.	01-27-1998 07-13-2012 05-04-2015	FGAUTODIP FGRTO FGMACTMMMM
EUCOE1	Chain-on-edge number 1 is two automated booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the spray guns. VOC emissions from this line are controlled by a Regenerative Thermal Oxidizer.	07-18-2005 07-13-2012 05-04-2015	FGSPRAYMACHINES FGRTO FGMACTMMMM
EUCOE2	Chain-on-edge number 2 is two automated booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the spray guns. VOC emissions from this line are controlled by a Regenerative Thermal Oxidizer.	07-18-2005 07-13-2012 05-04-2015	FGSPRAYMACHINES FGRTO FGMACTMMMM
EUCOE3	Chain-on-edge number 3 is two automated booths for applying cement to metal and plastic parts. The chain-on-edge rotates the parts through the spray guns and then dries the parts in an oven. VOC emissions from this line are controlled by a Regenerative Thermal Oxidizer.	01-01-1986 07-13-2012 05-04-2015	FGSPRAYMACHINES FGRTO FGMACTMMMM

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUCOE4	Chain-on-edge number 4 is two automated booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre- heat oven. The chain-on-edge rotates the parts through the spray guns. VOC emissions from this line are controlled by a common Regenerative Thermal Oxidizer.	08-01-2015	FGSPRAYMACHINES FGRTO FGMACTMMMM
EUROLLCOAT	A roll coat process with primer and adhesive application stations connected by a conveyor system. The cements are dried by an electric dryer. VOC emissions from the system are controlled by a Regenerative Thermal Oxidizer.	05-20-2013	FGRTO FGMACTMMMM
EUROTSPRAY1	A rotary spray booth that applies adhesive to metal and plastic parts. The cements are dried by an electric dryer. VOC emissions from the system are controlled by a common Regenerative Thermal Oxidizer.	11-21-2017	FGSPRAYMACHINES FGRTO FGMACTMMMM
EUADHESIVE1	An adhesive machine that includes a primer booth and topcoat booth. VOC emissions from the machine are controlled by a Regenerative Thermal Oxidizer.	TBD	FGSPRAYMACHINES FGRTO FGMACTMMMM

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
FGRTO	Two automatic dip spin lines, four automated chain-on-edge lines, a rotary spray line, a roll coater, and an adhesive machine consisting of two spray booths all used to coat metal and plastic parts. The VOC emissions from these nine lines are controlled by a permanent total enclosure and common Regenerative Thermal Oxidizer.	EUAUTODIP EUAUTODIP2 EUCOE1 EUCOE2 EUCOE3 EUCOE4 EUROLLCOAT EUROTSPRAY1 EUADHESIVE1
FGMACTMMMM	Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR Part 63, Subpart MMMM, (40 CFR 63.3881(a)(2) through (6)), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 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. 40 CFR Part 63, Subpart MMMM does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).	EUAUTODIP EUAUTODIP2 EUCOE1 EUCOE2 EUCOE3 EUCOE4 EUROLLCOAT EUROTSPRAY1, EUADHESIVE1

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGSPRAYMACHINES	Chain-on-edge (COE) numbers 1, 2, and 4 consist of two automated booths each for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre- heat oven. COE number 3 is an automated booth for applying cement to metal and plastic parts; however, parts do not pass through a pre-heat oven. The chain-on-edge rotates the parts through the spray guns. VOC emissions from these lines are controlled by a common Regenerative Thermal Oxidizer. EUROTSPRAY1 is a rotary spray booth that applies adhesive to metal and plastic parts. The cements are dried by an electric dryer. VOC emissions from the system are controlled by a common Regenerative Thermal Oxidizer. EUADHESIVE1 is an adhesive machine that includes a primer booth and topcoat booth. VOC emissions from the machine are controlled by a Regenerative Thermal Oxidizer.	EUCOE1 EUCOE2 EUCOE3 EUCOE4 EUROTSPRAY1 EUADHESIVE1

FGRTO
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two automatic dip spin lines, four automated chain-on-edge lines, a rotary spray line, a roll coater, and an adhesive machine consisting of two spray booths all used to coat metal and plastic parts. The VOC emissions from these nine lines are controlled by a permanent total enclosure and common Regenerative Thermal Oxidizer.

Emission Units: EUAUTODIP, EUAUTODIP2, EUCOE1, EUCOE2, EUCOE3, EUCOE4, EUROLLCOAT, and EUROTSPRAY1, EUADHESIVE1

POLLUTION CONTROL EQUIPMENT

Permanent Total Enclosure (PTE) on EUCOE1, EUCOE2, EUCOE3, EUCOE4, and EUROTSPRAY1, and Regenerative Thermal Oxidizer (RTO)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	56.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGRTO, except EUROTSPRAY1	SC VI.2 SC VI.3	R 336.1205, R 336.1702(a)
2. VOCs	4.8 tpy	12-month rolling time period as determined at the end of each calendar month	EUROTSPRAY1	SC VI.2 SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGRTO unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained and updated within 30 days of installation of EUADHESIVE1. 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, 40 CFR 52.21(c) and (d))**

2. For FGRTO except EUADHESIVE1, the permittee shall either maintain a minimum of 0.007 inches 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 336.1702(a), R 336.1910)**

3. For EUADHESIVE1, the average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f) for non-PTE enclosures. **(R 336.1702(a), R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGRTO unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC destruction efficiency of 95% (by weight), maintaining a minimum temperature of 1,500°F, and a minimum retention time of 0.5 seconds. The minimum temperature may be adjusted based on the most recent acceptable stack test which achieved a minimum overall destruction efficiency of 95%. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910)**

2. The permittee shall not operate EUCOE1, EUCOE2, EUCOE3, EUCOE4, or EUROTSPRAY1 unless their respective PTE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that each PTE is operating at a pressure lower than all respective adjacent areas so that air flows into each PTE through all Natural Draft Openings. Natural Draft Opening is defined as any opening that is not connected to a duct in which a fan or blower is installed. **(R 336.1205, R 336.1702(a), R 336.1910)**

3. The permittee shall not operate EUADHESIVE1 unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 80 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight) or the minimum combustion zone temperature from the most recent acceptable stack test and maintaining a minimum temperature of 1450 °F and a minimum retention time of 0.5 seconds. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910)**

4. 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 the temperature on a continuous basis during operation of FGRTO. **(R 336.1224, R 336.1225, R 336.1702)**

5. If the enclosure is a PTE, the permittee shall install, calibrate, maintain and operate, in a satisfactory manner, an exhaust flow monitor or a differential pressure gauge to monitor the pressure differential between each PTE in FGRTO and the respective outside area on a continuous basis during operation of the respective portion of FGRTO. **(R 336.1205, R 336.1702(a), R 336.1910)**

6. If the enclosure is not a PTE, the permittee shall not operate EUADHESIVE1 unless the respective enclosure is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following: **(R 336.1702(a), R 336.1910)**

   a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

V. TESTING/SAMPLING

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

1. The VOC content, water content and density of any adhesives and coatings, as applied and as received, shall be determined randomly on a yearly basis with all coatings and adhesives tested within a five-year period using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the VOC

content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, then the Method 24 results shall be used to determine compliance. **(R 336.1702(a))**

2. The permittee shall verify destruction efficiency of the RTO by testing at the owner's expense, in accordance with the Department requirements at least once every five (5) years. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved USEPA 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 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c)&(d), R 336.12001, R 336.2003, R 336.2004)**

3. Within 90 days after achieving maximum production rate, but not later than 180 days after the commencement operation of EUADHESIVE1, the permittee shall verify the VOC capture efficiency of EUADHESIVE1, by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every five years after the initial test. 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. **(R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225, R 336.1702)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each cement, adhesive, coating, thinner, solvent, additive, and catalyst, including the weight percent of each component. The data may consist of MSDS, 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)**

3. The permittee shall keep the following information on a monthly basis for EUROTSPRAY1 and FGRTO:

   d. Gallons (with water) of each material used and, if applicable, reclaimed.

   e. VOC content (with water) of each material as applied.

   f. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.

   g. 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, R 336.1225, R 336.1702)**

4. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the RTO on a continuous basis, during operation of FGRTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request. **(R 336.1702)**

5. The permittee shall monitor and record, in a satisfactory manner, the pressure differential between each PTE for FGRTO and the outside area, on a continuous basis, to verify that air is entering each of the PTE. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1702)**

6. The permittee shall continuously monitor and record the combustion chamber temperature of the RTO, as described in SC VI.5 (above) as an indicator of proper operation of the RTO. The indicator range is a minimum combustion temperature of 1500°F during operation of the RTO. An excursion is defined as a 3-hour block average temperature that is less than the required minimum temperature of 1500°F. The monitor shall be calibrated or replaced annually. **(R 336.1205, R 336.1702)**

7. During operation of EUCOE1, EUCOE2, EUCOE3, EUCOE4, or EUROTSPRAY1, the permittee shall monitor and record the direction of air flow, in a satisfactory manner, by monitoring and recording either of the following:
   a) The facial velocity of 200 fpm of air flow through all natural draft openings; or
   b) The pressure differential of 0.007 inches of water.

   Data recording shall consist of continuous measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep records of the 3-hour block average of the facial velocity or pressure drop. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of EUADHESIVE1 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 EUADHESIVE1. **(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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTO	30	42	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 MMMM for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date. **(40 CFR Part 63, Subparts A and MMMM)**

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

FGSPRAYMACHINES
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Chain-on-edge (COE) numbers 1, 2, and 4 consist of two automated booths each for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre- heat oven. COE number 3 is an automated booth for applying cement to metal and plastic parts; however, parts do not pass through a pre-heat oven. The chain-on-edge rotates the parts through the spray guns. The adhesive machine consists of two booths, each for applying adhesive to metal and plastic parts. VOC emissions from these lines are controlled by a common Regenerative Thermal Oxidizer.

EUROTSPRAY1 is a rotary spray booth that applies adhesive to metal and plastic parts. The cements are dried by an electric dryer. VOC emissions from the system are controlled by a common Regenerative Thermal Oxidizer.

EUADHESIVE1 is an adhesive machine that includes a primer booth and topcoat booth. VOC emissions from the machine are controlled by a Regenerative Thermal Oxidizer

Emission Units: EUCOE1, EUCOE2, EUCOE3, EUCOE4, EUROTSPRAY1, EUADHESIVE1

POLLUTION CONTROL EQUIPMENT

Dry fabric filters, Regenerative Thermal Oxidizer (RTO)

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste cements, adhesives, coatings, thinners, additives and catalysts and shall store them in closed containers. The permittee shall dispose of all waste cements, adhesives, coatings, thinners, additives and catalysts 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 maintain a MAP for the equipment listed in this permit. 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. This MAP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The MAP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures. **(R 336.1702, R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booth portions of FGSPRAYMACHINES unless all respective exhaust filters are installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1910)**

2. The permittee shall equip and maintain the spray booth portions of FGSPRAYMACHINES 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))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

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. SVRTO	30	42	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 MMMM for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date. **(40 CFR Part 63, Subparts A and MMMM)**

Footnotes:

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