

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

EFFECTIVE DATE: October 11, 2021
ISSUED TO

OX Paperboard WP, LLC

State Registration Number (SRN): B2024

LOCATED AT

15781 River Street, White Pigeon, Saint Joseph County, Michigan

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2024-2021

Expiration Date: October 11, 2026

Administratively Complete ROP Renewal Application Due Between April 11, 2025
and April 11, 2026

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B2024-2021

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or is state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (**R 336.1213(5)**)
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (**R 336.1213(5)(a), R 336.1214a(5)**)
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (**R 336.1213(5)(b), R 336.1214a(3)**)

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (**R 336.1213(1)(a)**)
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (**R 336.1213(1)(b)**)
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (**R 336.1213(1)(c)**)
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: (**R 336.1213(1)(d)**)
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (**R 336.1213(1)(e)**)

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (**R 336.1213(1)(f)**)
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (**R 336.1213(1)(g)**)
8. This ROP does not convey any property rights or any exclusive privilege. (**R 336.1213(1)(h)**)

Equipment & Design

9. Any 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).² (**R 336.1370**)
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (**R 336.1910**)

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² (**R 336.1301(1)**)
 - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ (**R 336.1901(a)**)
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ (**R 336.1901(b)**)

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² (**R 336.2001**)
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (**R 336.2001(2)**, **R 336.2001(3)**, **R 336.2003(1)**)
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (**R 336.2001(5)**)

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete." The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (**R 336.1213(6)(b)(iv)**)
- 28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. (**R 336.1215(5)**)
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (**R 336.1216(1)(b)(iii)**)
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (**R 336.1216(1)(c)(iii)**)
 - d. Minor Permit Modifications made pursuant to Rule 216(2). (**R 336.1216(2)(f)**)
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (**R 336.1216(4)(e)**)
- 29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (**R 336.1217(1)(c), R 336.1217(1)(a)**)

Revisions

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (**R 336.1215, R 336.1216**)
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (**R 336.1219(2)**)
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (**R 336.1210(10)**)
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (**R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d)**)

Reopenings

- 34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
 - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. (**R 336.1217(2)(a)(i)**)
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (**R 336.1217(2)(a)(ii)**)
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. (**R 336.1217(2)(a)(iii)**)
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (**R 336.1217(2)(a)(iv)**)

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82 and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (**R 336.1201(1)**)
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (**R 336.1201(8), Section 5510 of Act 451**)
45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² (**R 336.1219**)
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (**R 336.1201(4)**)

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

SOURCE-WIDE CONDITIONS

DESCRIPTION

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. HAPs (Individual)	9.0 tpy	Based on a 12-month rolling period determined at the end of each month	SOURCE-WIDE	SC VI.1	R 336.1213(2)
2. HAPs (Combined)	22.5 tpy	Based on a 12-month rolling period determined at the end of each month	SOURCE-WIDE	SC VI.2	R 336.1213(2)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall maintain monthly records of the calculation of the emission rates for each individual HAP for the stationary source in tons per 12-month rolling time period as determined at the end of each calendar month. (**R 336.1213(3)**)
2. The permittee shall maintain monthly records of the calculation of the emission rates for total combined HAPs for the stationary source in tons per 12-month rolling time period as determined at the end of each calendar month. (**R 336.1213(3)**)
3. The permittee shall maintain records of the amount of each HAP contained in each fuel, coating, additive and solvent used at the facility. (**R 336.1213(3)**)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

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
EUBoILER#2	122.5 MMBTU/hr combustion engineering boiler that generates steam for EUPAPER MACHINE. Particulate emissions are controlled by a multiclone. Unit was modified in 1981 to burn gas and fuel oil firing capability was permanently removed in 2020. Unit is defined as a "Gas-fired Boiler" for purposes of the Boiler MACT, 40 CFR Part 63, Subpart JJJJJ.	01-01-1948 02-26-1981	NA
EUBoILER#3	96.3 MMBTU/hr Cleaver Brooks gas fired boiler that generates up to 75,000 pounds steam per hour for EUPAPER MACHINE. The NOx emissions are controlled by flue gas recirculation. Unit is defined as a "Gas-fired Boiler" for purposes of the Boiler MACT, 40 CFR Part 63, Subpart JJJJJ.	09-30-2003	NA
EUPAPER MACHINE	The emission unit includes: the pulping operation that consists of four hydropulpers where the recycled fibers are made into a slurry and retention aids, dyes and pulp additives are combined with the recycled fiber slurry; and the paper machine that consists of the formation and drying of the uncoated recycled board. Modification in 1994 was to add retention aids.	01-01-1900 07-21-1994	NA
EURICEMACT	All RICE subject to the RICE MACT as specified in 40 CFR Part 63, Subpart ZZZZ. The only engine subject to the RICE MACT is the 190 hp diesel fire pump engine.	08-1975	FGRICEMACT
EUPARTSWASHER	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	08-05-1996 NA	FGCOLDCLEANERS

EUBOILER#2 EMISSION UNIT CONDITIONS

DESCRIPTION

122.5 MMBTU/hr combustion engineering boiler that generates steam for EUPAPER MACHINE. Particulate emissions are controlled by a multiclone. Unit was modified in 1981 to burn gas and fuel oil firing capability was permanently removed in 2020. Unit is defined as a "Gas-fired Boiler" for purposes of the Boiler MACT, 40 CFR Part 63, Subpart JJJJJ.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Multiclone

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only fire pipeline grade natural gas in EUBOILER#2. This condition is required to avoid being subject to the National Emission Standard for Hazardous Air Pollutants for Commercial and Industrial Boilers for Area Sources promulgated in 40 CFR Part 63, Subparts A and JJJJJ. (**R 336.1213(2), 40 CFR Part 63.11195(e)**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall keep records of the measures taken and results of implementing the Preventative Maintenance Program in Appendix 9. (**R 336.1213(3)**)
2. The permittee shall maintain monthly records of natural gas usage, recorded in cubic feet. (**R 336.1213(3)**)

See Appendix 9

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall follow the Preventative Maintenance Plans and Malfunction Abatement Plan for boiler operation described in Appendices 9.A. and 9.B. (**R 336.1213(3)**)

See Appendix 9

Footnotes:

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

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUBOILER#3 EMISSION UNIT CONDITIONS

DESCRIPTION

96.3 MMBTU/hr Cleaver Brooks gas fired boiler that generates up to 75,000 pounds steam per hour for EUPAPER MACHINE. The NOx emissions are controlled by flue gas recirculation. Unit is defined as a "Gas-fired Boiler" for purposes of the Boiler MACT, 40 CFR Part 63, Subpart JJJJJ.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Flue gas recirculation

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. CO	0.08 lb/MMBTU heat input ²	Hourly	EUBOILER#3	SC V.1	R 336.1201(3)
2. CO	35.5 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUBOILER#3	SC VI.1	R 336.1205(3)
3. NOx	0.05 lb/MMBTU heat input ²	Hourly	EUBOILER#3	SC V.1	R 336.1201(3)
4. NOx	21.1 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUBOILER#3	SC VI.2	R 336.1205(3)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall burn only natural gas in EUBOILER#3.² (**R 336.1410, 40 CFR Part 60, Subpart Dc**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. Within 12 months of permit issuance, the permittee shall verify NOx and CO emission rates from EUBOILER#3 by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in:

Pollutant	Test Method Reference
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NOx	40 CFR Part 60, Appendix A
CO	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 336.1213(3), R 336.2001, R 336.2003, R 336.2004**)

2. The permittee shall verify the NOx and CO emission rates from EUBOILER#3, at a minimum, every five years from the date of the last test. (**R 336.1213(3), R 336.2001, R 336.2003, R 336.2004**)
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (**R 336.1213(3)**)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall demonstrate compliance with the CO 12-month rolling time period mass emission limit by using the emission factor, in pounds per million BTU heat input as determined from the most recent stack test, and the natural gas usage rates. The 12-month rolling time period for tracking annual mass emissions of CO in tons per year shall be calculated at the end of each calendar month. The permittee may demonstrate compliance by alternative methods upon notice to and approval by the Department.² (**R 336.1205(3)**)
2. The permittee shall demonstrate compliance with the NOx 12-month rolling time period mass emission limit by using the emission factor, in pounds per million BTU heat input as determined from the most recent stack test, and the natural gas usage rates. The 12-month rolling time period for tracking annual mass emissions of NOx in tons per year shall be calculated at the end of each calendar month. The permittee may demonstrate compliance by alternative methods upon notice to and approval by the Department.² (**R 336.1205(3)**)
3. The permittee shall monitor emissions and operating information for EUBOILER#3 in accordance with the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Dc.² (**40 CFR Part 60, Subparts A and Dc**)
4. The permittee shall keep monthly natural gas usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, based on:
 - a. An average calendar day basis
 - b. A calendar month basis
 - c. A 12-month rolling time period basisThe records must indicate the total amount of natural gas used in EUBOILER#3.² (**R 336.1213(3)**)
5. The permittee shall keep records of the measures taken and results of implementing the Preventative Maintenance and Malfunction Abatement Programs in Appendix 9. (**R 336.1213(3)**)

See Appendix 9

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)
4. The permittee shall submit any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (**R 336.1213(3)(c), R 336.2001(5)**)

See Appendix 8

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. SV003	48 ²	100 ²	40 CFR 52.21(c)&(d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall follow the Preventative Maintenance Plans and Malfunction Abatement Plan for boiler operation described in Appendices 9.A. and 9.B. (**R 336.1213(3)**)
2. The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subparts A and Dc. (**40 CFR Part 60 Subparts A and Dc**)

See Appendix 9

Footnotes:

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

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUPAPER MACHINE EMISSION UNIT CONDITIONS

DESCRIPTION

The emission unit includes: the pulping operation that consists of four hydropulpers where the recycled fibers are made into a slurry and retention aids, dyes and pulp additives are combined with the recycled fiber slurry; and the paper machine that consists of the formation and drying of the uncoated recycled board. Modification in 1994 was to add retention aids.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. VOC (retention aids, dyes and pulp additives)	9.1 pph ²	Monthly Average	EUPAPER MACHINE	SC VI.1 and VI.4	R 336.1702(a)
2. VOC (retention aids, dyes and pulp additives)	35.0 tpy ²	Based on 12-month rolling time period	EUPAPER MACHINE	SC VI.5	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall record the hours of operation on a calendar month basis for EUPAPER MACHINE. (R 336.1213(3))
2. The permittee shall maintain records of formulation data, including Material Safety Data Sheets, for retention aids, dyes, and pulp additives used for EUPAPER MACHINE. (R 336.1213(3))

3. The permittee shall maintain monthly records of the amount of retention aids, dyes, and pulp additives used for EUPAPER MACHINE in pounds.² (**R 336.1201(3)**)
4. The permittee shall calculate and maintain monthly records of the VOC emission rate from retention aids, dyes, and pulp additives from EUPAPER MACHINE in pounds per hour. (**R 336.1213(3)**)
5. The permittee shall calculate and maintain monthly records of the VOC emission rate from retention aids, dyes, and pulp additives from EUPAPER MACHINE in tons per year based on a 12-month rolling time period. (**R 336.1213(3)**)
6. The permittee shall maintain monthly records of the VOC content of retention aids, dyes, and pulp additives used for EUPAPER MACHINE.² (**R 336.1201(3)**)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

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
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUPARTSWASHER
FGRICEMACT	40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at an area source of HAP emissions, existing emergency, compression ignition (CI) RICE equal to or less than 500 brake hp. A RICE is existing if the date of installation is before June 12, 2006.	EURICEMACT

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EUPARTSWASHER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. **(R 336.1213(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(2)(h))**
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(2)(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

- a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (**R 336.1707(2)(a)**)
- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (**R 336.1707(2)(b)**)
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (**R 336.1707(2)(c)**)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (**R 336.1213(3)**)
2. The permittee shall maintain the following information on file for each cold cleaner: (**R 336.1213(3)**)
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (**R 336.1611(3), R 336.1707(4)**)
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (**R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c)**)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRICEMACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at an area source of HAP emissions, existing emergency, compression ignition (CI) RICE equal to or less than 500 brake hp. A RICE is existing if the date of installation is before June 12, 2006.

Emission Unit: EURICEMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. (40 CFR 63.6604(b), 40 CFR 1090.305)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must comply with the requirements in Item 4 of Table 2d of 40 CFR Part 63, Subpart ZZZZ which apply to each engine in FGRICEMACT as specified in the following:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. (40 CFR 63.6603(a), 40 CFR Part 63, Subpart ZZZZ, Table 2d.4)

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC III.1. (40 CFR 63.6625(i))
3. The permittee shall operate and maintain each engine in FGRICEMACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which

must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (**40 CFR 63.6605, 40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6.9**)

4. For each engine in FGRICEMACT, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. (**40 CFR 63.6625(h)**)
5. The permittee may operate each engine in FGRICEMACT for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. (**40 CFR 63.6640(f)(2)**)
6. Each engine in FGRICEMACT may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in SC III.5. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (**40 CFR 63.6640(f)(4)**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each engine in FGRICEMACT with non-resettable hours meters to track the operating hours. (**40 CFR 63.6625(f)**)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (**40 CFR 63.6625(i)**)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. For each engine in FGRICEMACT, the permittee shall keep in a satisfactory manner the following:
 - a. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted,
 - b. Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment,

- c. Records of performance tests and performance evaluations,
- d. Records of all required maintenance performed on the air pollution control and monitoring equipment,
- e. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

The permittee shall keep all records on file and make them available to the department upon request. (**40 CFR 63.6655(a), 40 CFR 63.6660**)

- 2. For each engine in FGRICEMACT, the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or of a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall keep all records on file and make them available to the department upon request. (**40 CFR 63.6655(d), 40 CFR 63.6660, 40 CFR Part 63, Subpart ZZZZ, Table 6.9**)
- 3. For each engine in FGRICEMACT, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. (**40 CFR 63.6655(e), 40 CFR 63.6660**)
- 4. The permittee shall monitor and record, the total hours of operation for each engine in FGRICEMACT on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGRICEMACT on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for emergency operation. The permittee shall keep all records on file and make them available to the department upon request. (**40 CFR 63.6655(f), 40 CFR 63.6660**)
- 5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FGRICEMACT, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. (**R 336.1213(3), 40 CFR 1090.305**)
- 6. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). (**40 CFR 63.6660(a)**)
- 7. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (**40 CFR 63.6660(b)**)

VII. REPORTING

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)

4. The permittee shall submit to the AQD District Supervisor, a semiannual compliance report, as specified in 40 CFR 63.6650, which contains all deviations during the reporting period from the operating limitations specified in SC III.1. If there are no deviations from any applicable emission limitations or operating limitations, the report shall contain a statement that there were no deviations during the reporting period. The first report shall cover the period beginning on the applicable compliance date specified in 40 CFR 63.6595 and ending on June 30 (postmarked or delivered by July 31) or December 31 (postmarked or delivered by January 31), whichever date is the first date following the end of the first calendar half after the applicable compliance date. Each subsequent report must cover the semiannual period from January 1 through June 30, or from July 1 through December 31. The subsequent reports must be postmarked or delivered by July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period, except as allowed in 40 CFR 63.6650(b)(5). The compliance report must also contain the following information, as specified in 40 CFR 63.6650(c) and (d):
 - a. Company name and address.
 - b. Certification of the report by a responsible official.
 - c. Date of report and beginning and ending dates of the reporting period.
 - d. The number of malfunctions, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused the operating limitations specified in SC III.1 to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.
 - e. The total operating time of the RICE at which the deviation occurred during the reporting period.
 - f. The number, duration, and cause of deviations and the corrective action taken.

A copy of the compliance report shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. (**40 CFR 63.6640(b)**, **40 CFR 63.6650(b), (c), and (d)**, **40 CFR 63.6660**)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

² This condition is federally enforceable and was established

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUPAPER MACHINE	R 336.1610(2)(f)	Retention aides, dyes, and pulp additives added to the wet end are not considered paper coatings.

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations
AQD	Air Quality Division	acf m 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
CEMS	Continuous Emission Monitoring System	dscf Dry standard cubic foot
CFR	Code of Federal Regulations	dscm Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP Hazardous Air Pollutant
EU	Emission Unit	Hg Mercury
FG	Flexible Group	hr Hour
GACS	Gallons of Applied Coating Solids	HP Horsepower
GC	General Condition	H ₂ S Hydrogen Sulfide
GHGs	Greenhouse Gases	kW Kilowatt
HVLP	High Volume Low Pressure*	lb Pound
ID	Identification	m Meter
IRSL	Initial Risk Screening Level	mg Milligram
ITSL	Initial Threshold Screening Level	mm Millimeter
LAER	Lowest Achievable Emission Rate	MM Million
MACT	Maximum Achievable Control Technology	MW Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng Nanogram
NA	Not Applicable	PM Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10 Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5 Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph Pounds per hour
NSR	New Source Review	ppm Parts per million
PS	Performance Specification	ppmv Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw Parts per million by weight
PTE	Permanent Total Enclosure	% Percent
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
SDS	Safety Data Sheet	TAC Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp Temperature
SRN	State Registration Number	THC Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg Microgram
VE	Visible Emissions	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.

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (**R 336.1213(4)(a), R 336.1119(a)(ii)**)

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2024-2015. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2024-2015 is being reissued as Source-Wide PTI No. MI-PTI-B2024-2021.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	202000128*	Change in ownership to Ox Paperboard WP, LLC.	NA
NA	201900151	Change in ownership to GPI Midwest, LLC.	NA

Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

Appendix 9. Preventative Maintenance and Malfunction Abatement Plans

9.A. Boiler Preventative Maintenance Plan

1. The permittee shall perform the following preventative maintenance for EUBOILER#2:
 - a. Yearly shutdown and inspection of internal components and auxiliary equipment.
 - b. Repair and replacement of internal components and auxiliary equipment as needed, to insure proper operation.
 - c. Yearly inspection of the multiclone soot hoppers.
 - d. Cleaning and repair of multiclone soot hoppers, if needed.
2. The permittee shall perform the following preventative maintenance for EUBOILER#3:
 - a. Yearly shutdown and inspection of internal components and auxiliary equipment.
 - b. Repair and replacement of internal components and auxiliary equipment as needed, to insure proper operation.

9.B. Malfunction Abatement Plan

The permittee shall implement the following Malfunction Abatement Plan for EUBOILER#2 and EUBOILER#3 whenever a malfunction is detected or observed. This Malfunction Abatement Plan meets the requirements of R 336.1911 and has been approved by AQD.

1. As part of the Malfunction Abatement Plan, the permittee shall perform routine preventative maintenance as described in the emission unit tables and 9.A. above for EUBOILER#2 and EUBOILER#3. The permittee shall keep a written record for each boiler of the dates on which preventative maintenance is performed, the items that are inspected, the items that are repaired and the names of staff members performing the inspections and repairs and the names of the supervisory personnel responsible for overseeing the inspections and repairs. **(R 336.1911(2)(a))**
2. The permittee shall comply with the requirements described below and in the emission unit tables for EUBOILER#2 and EUBOILER#3 as part of the Malfunction Abatement Plan during malfunction or when abnormal visible emissions are observed **(R 336.1911(2)(c))**:
 - a. An experienced boiler operator shall perform regular monitoring of the exhaust stack for EUBOILER#2 and EUBOILER#3.
 - b. Monitoring may include visual observations or remote observations using the stack exhaust video monitor.
 - c. If the boiler operator determines that a deviation or malfunction has occurred, the cause of the deviation or malfunction shall be determined within 24 hours of the discovery of the deviation or malfunction.
 - d. Possible corrective actions will be identified, and the most practical corrective actions will be implemented to correct the deviation or malfunction within 7 days of the discovery of the deviation or malfunction; or
 - i. For EUBOILER#3: Boiler will be shut down until cause of the malfunction is rectified