

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

EFFECTIVE DATE: September 23, 2020

ISSUED TO

Romeo RIM, Inc.

State Registration Number (SRN): B5854

LOCATED AT

74000 Van Dyke Avenue, Romeo, Macomb County, Michigan 48065

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B5854-2020

Expiration Date: September 23, 2025

Administratively Complete ROP Renewal Application
Due Between March 23, 2024 and March 23, 2025

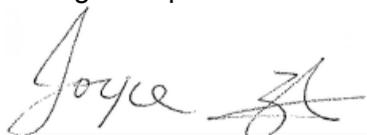
This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 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-B5854-2020

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



Joyce Zhu, Warren District Supervisor

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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 reclaiming, 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.

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
EU-PLT2-LINE1	Plant 2, Paint Line 1 - Spray Coating Line consisting of one paint spray booth, one flash-off area, one bake oven, and one parts-wipe process done prior to coating. Line utilizes acetone for purge and also has post-mold paint storage and mixing room. Applies paint to miscellaneous plastic parts.	06-01-1992	FG-MACT-SUBPART_PPPP
EU-PLT2-RIM45	Plant 2 - RIM 45 (11x14) 600-ton Pacific Reaction Injection Molding (RIM) press which processes polyurethane-containing materials. When polyurethane materials are processed, mold release agents are used, and in-mold coating may also be used. Includes press enclosure with two banks of particulate filters (in series) for exhaust gases. High volume, low pressure (HVLP) applicators are used for the application of the in-mold coatings. Acetone is used for purge and clean-up activities.	01-2009	FG-MACT-SUBPART_PPPP
EU-PLT1-IMP2	Plant 1 - Clamp No.2 (Cinci-1) - A 75-ton Cincinnati Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	12-26-1991	FG-PLT1-RIM-IMP FG-MACT-SUBPART_PPPP
EU-PLT1-IMP12	Plant 1 - Clamp No. 12 (LFI-3) - A 150-ton Cincinnati Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	01-07-1979/ 04-2004	FG-PLT1-RIM-IMP FG-MACT-SUBPART_PPPP
EU-PLT1-IMP24	Plant 1 - Clamp No. 24 (LFI-5) - A 150-ton Cincinnati Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	09-28-2009	FG-PLT1-RIM-IMP FG-MACT-SUBPART_PPPP

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-PLT1-IMP26	Plant 1 - Clamp No. 26 (LFI-1) - A 125-ton Cincinnati (North) Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	12-16-1994	FG-PLT1-RIM-IMP FG-MACT- SUBPART_PPPP
EU-PLT1-IMP28	Plant 1 - Clamp No. 28 (LFI-2) - A 125-ton Cincinnati (South) Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	12-28-1994	FG-PLT1-RIM-IMP FG-MACT- SUBPART_PPPP
EU-PLT1-IMP29	Plant 1 - Clamp No. 29 (LFI-4) - A 150-ton Cincinnati (East) Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	11-04-1994	FG-PLT1-RIM-IMP FG-MACT- SUBPART_PPPP
EU-PLT1-IMP50	Plant 1 - Clamp No. 50 (Cinci-2) - A 75-ton Cincinnati (Cinci 2) Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	12-27-1991	FG-PLT1-RIM-IMP FG-MACT- SUBPART_PPPP
EU-PLT1-IMP51	Plant 1 - Clamp No. 51 (LRM-1) - A Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	TBD	FG-PLT1-RIM-IMP FG-MACT- SUBPART_PPPP
EU-PLT1-IMP52	Plant 1 - Clamp No. 52 (LRM-2) - A Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts.	TBD	FG-PLT1-RIM-IMP FG-MACT- SUBPART_PPPP
EU-PLT1-LINE1	Plant 1, Paint Line 1 - Includes spray booth #1 (exhausts uncontrolled through stack #11), a flash off area, and oven #9. Applies coatings to miscellaneous plastic parts. Includes post-mold paint storage and mixing rooms associated with Lines 1-2.	01-02-1978	FG-PLT1-SCL1&2 FG-MACT- SUBPART_PPPP
EU-PLT1-LINE2	Plant 1, Paint Line 2 - Includes spray booth #2 (exhausts uncontrolled through stack #10), a flash off area, and oven #9. Applies coatings to miscellaneous plastic parts.	01-02-1978	FG-PLT1-SCL1&2 FG-MACT- SUBPART_PPPP
EU-PLT2-RIM42	Plant 2 - RIM 42 (5x7) - A 100-ton PPD Reaction Injection Molding (RIM) press with in-mold paint. When DCPD containing materials are processed, the VOC emissions are controlled by carbon adsorption system which has two banks of particulate filters (in series) followed by two carbon filter banks (in series).	08-1994	FG-RIMPROCESS FG-MACT- SUBPART_PPPP

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-PLT2-RIM43	Plant 2 - RIM 43 (11x6) - A 120-ton PPD RIM press with in-mold paint. When DCPD containing materials are processed, the VOC emissions are controlled by carbon adsorption system which has two banks of particulate filters (in series) followed by two carbon filter banks (in series).	04-1999	FG-RIMPROCESS FG-MACT- SUBPART_PPPP
EU-PLT2-RIM44	Plant 2 - RIM 44 (10x12) - A 300-ton PPD RIM press with in-mold paint. When DCPD containing materials are processed, the VOC emissions are controlled by carbon adsorption system which has two banks of particulate filters (in series) followed by two carbon filter banks (in series).	05-09-1995	FG-RIMPROCESS FG-MACT- SUBPART_PPPP
EU-CLEANUP	Acetone used for purge and cleanup activities associated with EU-PLT2-RIM42, EU-PLT2-RIM43, and EU-PLT2-RIM44. No acetone purge and cleanup activities take place within the three press enclosures.	10-27-2003	FG-RIMPROCESS FG-MACT- SUBPART_PPPP
EU-MOLDRELEASE	Mold release is applied to the mold prior to coating. This will be manually spray applied within one of the two spray booths (EU-CLAMPBOOTH1 and/or EU-CLAMPBOOTH2).	10-2011	FG-SHUTTLECLAMP FG-MACT- SUBPART_PPPP
EU-CLAMPBOOTH1	Paint/catalyst mixture and barrier coat will be applied to a mold inside this booth. Robotic JVLP applicators will be used to apply the coatings. Fabric filters will be used to control particulate from overspray.	10-2011	FG-SHUTTLECLAMP FG-MACT- SUBPART_PPPP
EU-CLAMPBOOTH2	Paint/catalyst mixture and barrier coat will be applied to a mold inside this booth. Robotic JVLP applicators will be used to apply the coatings. Fabric filters will be used to control particulate from overspray.	10-2011	FG-SHUTTLECLAMP FG-MACT- SUBPART_PPPP
EU-RESIN	Two-part resin mixture is injected into the mold (reaction injection molding). This process is not done within one of the spray booths.	10-2011	FG-SHUTTLECLAMP
EU-PAINTKITCHEN	Paint and catalyst materials will be stored here in sealed drums. Process lines will be connected to the appropriate drums and the paint and catalyst will be mixed into a delivery line to the process. This is a closed system with no expected emissions. There is an exhaust stack associated with the paint kitchen.	10-2011	FG-SHUTTLECLAMP FG-MACT- SUBPART_PPPP

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-FINISHING	Finishing operations will be done to the part after it is removed from the mold. These activities include sanding, trimming, drilling and water jet cutting. Emissions will be particulate and will be exhausted back to the in-plant environment.	10-2011	FG-SHUTTLECLAMP FG-MACT- SUBPART_PPPP
EU-PARTSWIPE	50/50 isopropyl alcohol and water mixture will be used to wipe the parts clean prior to packaging.	10-2011	FG-SHUTTLECLAMP FG-MACT- SUBPART_PPPP
EU-LINECLEANING	Cleaning solution will be used to clean out the paint delivery lines and spray tips. The solution will be captured into a closed drum.	10-2011	FG-SHUTTLECLAMP FG-MACT- SUBPART_PPPP
EU-ROTPAINTKITCHEN	Paint and catalyst materials will be stored here in sealed drums for the rotary carrier system injection molding line. Process lines will be connected to the appropriate drums and the paint and catalyst will be mixed into a delivery line to the process. This is a closed system, but there is an exhaust stack for general ventilation associated with the paint kitchen.	12-01-2016	FG-ROTARY FG-MACT- SUBPART_PPPP
EU-ROTFINISHING	Finishing operations for the rotary carrier system injection molding line will be done to the part after it is removed from the mold. These activities include sanding, trimming, drilling and water jet cutting. Particulate emissions will be exhausted to the in-plant environment.	12-01-2016	FG-ROTARY FG-MACT- SUBPART_PPPP
EU-ROTPARTSWIPE	50/50 isopropyl alcohol and water mixture will be used to wipe the parts clean prior to packaging in the rotary carrier system injection molding line.	12-01-2016	FG-ROTARY FG-MACT- SUBPART_PPPP
EU-ROTLINECLEANING	Cleaning solution will be used to clean out the paint delivery lines and spray tips. The solution will be captured in a closed drum.	12-01-2016	FG-ROTARY FG-MACT- SUBPART_PPPP
EU-ROTARYPAINT	Mold release is applied to the mold prior to a discrete number of coating/molding cycles using manual or robotic HVLP applicators or comparable technology with equivalent transfer efficiency. Paint/ catalyst mixture will be applied to a mold inside this booth using robotic HVLP applicators or comparable technology with equivalent transfer efficiency. High efficiency dry fabric filters will be used to control particulate from overspray.	12-01-2016	FG-ROTARY FG-MACT- SUBPART_PPPP

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-ROTARYBC	Barrier coat will be applied to a mold inside this booth. Robotic mix-head applicators with equivalent transfer efficiency to HVLP will be used to apply the barrier coating.	12-01-2016	FGROTARY FG-MACT- SUBPART_PPPP
EU-ROTARYLFI1	Two-part polyurethane mixture with embedded glass fibers is injected into the mold (reaction injection molding).	12-01-2016	FG-ROTARY
EU-ROTARYLFI2	Two-part polyurethane mixture with embedded glass fibers is injected into the mold (reaction injection molding).	12-01-2016	FG-ROTARY
EU-SPACOATING	Manually applied (sprayed) coating to spas (molded parts).	06-2014	FG-RULE287(2)(c) FG-MACT- SUBPART_PPPP
EU-RULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(2)(c).	NA	FG-RULE287(2)(c)
EU-PLT1PAINTWASH	Plant 1 paint room parts washer.	01-01-1997	FG-COLDCLEANERS
EU-PLT2MAINTWASH	Plant 2 maintenance parts washer.	01-01-1999	FG-COLDCLEANERS
EU-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 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.	NA	FG-COLDCLEANERS

**EU-PLT2-LINE1
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Plant 2, Paint Line 1-Spray Coating Line consisting of one paint spray booth, one flash-off area, one bake oven, and one parts-wipe process done prior to coating. Line utilizes acetone for purge and also has post-mold paint storage and mixing room. Applies paint to miscellaneous plastic parts.

Flexible Group ID: FG-MACT-SUBPART_PPPP

POLLUTION CONTROL EQUIPMENT

Exhaust Filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile Organic Compounds (VOC)	6.0 lbs/hour ²	Hourly	EU-PLT2-LINE1	SC VI.1 SC VI.2	R 336.1702(a)
2. Volatile Organic Compounds (VOC)	18.7 Tons/year ²	12-month rolling time period as determined at the end of each calendar month	EU-PLT2-LINE1	SC VI.1 SC VI.3	R 336.1702(a)
3. Acetone	0.6 lbs/hour ²	Hourly	Line Purging Process	SC VI.5	R 336.1201
4. Acetone	1.7 Tons/year ²	12-month rolling time period as determined at the end of each calendar month	Line Purging Process	SC VI.4	R 336.1201

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC content of each coating	3.9 lb/gal (minus water) ^a as applied ²	Instantaneous	EU-PLT2-LINE1	SC V.1	R 336.1702(d)

^a The phrase “minus water” shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compounds. (**R 336.1602(4)**)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall store all wipe rags used for the Parts-Wipe Process in closed containers when not in use and dispose of them in an acceptable manner in compliance with all applicable rules and regulations.² (**R 336.1201**)

2. The permittee shall dispose collected waste coatings, reducers, thinners, catalysts, parts-wipe solvents, purge solvents, and spent filters in a manner which minimizes the introduction of air contaminants in the outer air.² **(R 336.1370)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall apply all coatings utilizing HVLP spray guns or equivalent technology with comparable transfer efficiency. All coating applicators shall be properly installed, maintained and operated according to manufacturer's specifications.² **(R 336.1702(a))**
2. The permittee shall not operate the paint spray booth unless dry filters are installed and operated properly.² **(R 336.1910)**

V. TESTING/SAMPLING

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

1. The permittee shall conduct random testing of non-waterborne coatings, as applied, for the VOC content, solids content and density, using federal Reference Test Method 24 or EPA approved reference method, on a yearly basis with all coatings tested within a five-year period. **(R 336.1213(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 keep a separate record of the following for each month for the process:
 - a. For each coating sprayed:
 - i. The coating identification
 - ii. The VOC content in pounds per gallon of coating (minus water) as applied
 - iii. The VOC content, in pounds per gallon, of reducers, thinners, catalysts and the amount used, in gallons
 - iv. The total amount of coating used, in gallons, as applied
 - b. The total hours of operation
 - c. For the Parts Wipe Process:
 - i. The amount of solvent used, in gallons
 - ii. Calculations determining the VOC emission rate in tons per month and for a 12-month rolling time period

All such records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.² **(R 336.1702)**

2. The permittee shall calculate and keep records of VOC emission rate from EUPLT2-LINE1 calculated in pounds per hour determined on a monthly basis. **(R 336.1213(3))**
3. The permittee shall keep a separate record of VOC emission calculations determining a calendar month emission rate in tons per month and a 12-month rolling time period emission rate in tons per year for the coating process.² **(R 336.1702)**
4. The permittee shall keep a separate record for each calendar month of the following for line-purge operations:² **(R 336.1702)**
 - a. Amount of Acetone used and reclaimed
 - b. Calculations determining monthly acetone emissions in tons per month and 12-month rolling time period emission rate in tons per year.

5. The permittee shall keep a separate record for each calendar month of the following for line-purge operations: **(R 336.1213(3))**
 - a. Amount of Acetone used and reclaimed
 - b. The total hours of operation
 - c. Acetone emissions calculated in pounds per hour determined.
6. The permittee shall maintain a current listing of the chemical composition, of each VOC containing material used in the process, including the weight percent of each component. The data may consist of material safety data sheets, manufacturer's formulation data, or both.² **(R 336.1702)**
7. The VOC content, density, and solids weight and volume fractions of any coating (as applied) used in the process shall be determined using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, these parameters of any coating, as applied, may alternatively be determined using coating formulation data, which includes batch composition from the coating manufacturer and the amount of reducing agent or other compounds added to the coating. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1702)**
8. The permittee shall monitor and replace the exhaust filters in EU-PLT2-LINE1 pursuant to the schedule outlined in Appendix 3.1. **(R 336.1910)**
9. The permittee shall record the condition of the exhaust filters on a daily basis using the format pursuant to Appendix 4. **(R 336.1910)**
10. The permittee shall keep a list of all coatings used in the coating processes at the facility. The permittee should indicate the date of the testing and which coatings were randomly tested as required in SC V.1. The permittee shall keep records of the test results. **(R 336.1213(3))**

See Appendices 3.1 and 4

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)

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-045 BOOTH	34 ²	43 ²	R 336.1201
2. SV-046 FLASHOFF	34 ²	43 ²	R 336.1201

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
3. SV-047 BAKE OVEN	10 ²	35 ²	R 336.1201

IX. OTHER REQUIREMENT(S)

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

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).

**EU-PLT2-RIM45
 EMISSION UNIT CONDITIONS**

DESCRIPTION

600-ton, Pacific Reaction Injection Molding (RIM) press which processes polyurethane-containing materials. When polyurethane materials are processed, mold release agents are used, and in-mold coatings may also be used. Includes press enclosure with two banks of particulate filters (in series) for exhaust gases. HVLP applicators are used for the application of the in-mold coatings. Acetone is used for purge and clean-up activities.

Flexible Group ID: FG-MACT-SUBPART_PPPP

POLLUTION CONTROL EQUIPMENT

Particulate Filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs and acetone	32.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	EU-PLT2-RIM45	SC VI.3	R 336.1205 R 336.1224 R 336.1702(a)
2. Acetone (purge and clean-up)	2.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	EU-PLT2-RIM45	SC VI.4	R 336.1205 R 336.1224 R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	5.1 lb/gal (minus water) ^a as applied ²	Instantaneous	In-mold coatings for EU-PLT2-RIM45 (not applicable to mold release agents)	SC V.1	R 336.1702(a)

^a The phrase "minus water" shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compound.² (R 336.1602(4))

2. The permittee shall not process any dicyclopentadiene (DCPD) containing materials in EU-PLT2-RIM45.¹ (R 336.1901)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1702(a))
- The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² (R 336.1224, R 336.1370)

3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, mold release agents, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-PLT2-RIM45 unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² (R 336.1224, R 336.1301, R 336.1331, R 336.1901, R 336.1910)
2. The permittee shall equip and maintain EU-PLT2-RIM45 with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² (R 336.1702(a))

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any VOC containing materials, as applied and as received, using Federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² (R 336.1225, R 336.1702, R 336.1901, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))
2. The permittee shall conduct random testing of non-waterborne coatings, as applied, for the VOC content, solids content and density, using federal Reference Test Method 24 or EPA approved reference method, on a yearly basis with all coatings tested within a five-year period. (R 336.1213(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 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.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each in-mold coating, catalyst, mold release agent, polymeric resins, cleanup solvents, etc., including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1224, R 336.1225, R 336.1299, R 336.1702, R 336.1901)
3. The permittee shall keep the following information on a calendar month basis for EU-PLT2-RIM45:
 - a. Gallons or pounds of each VOC containing material used.
 - b. VOC (and acetone) content, in pounds per gallon (minus water and with water) or pounds per pound, of each VOC containing material used.
 - c. Aggregate VOC and acetone mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. Aggregate VOC and acetone mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

4. The permittee shall keep the following information on a calendar month basis for the use of purge and clean-up solvents associated with EU-PLT2-RIM45:
 - a. Gallons of each solvent used and reclaimed.
 - b. Acetone content, in pounds per gallon, of each solvent used.
 - c. Acetone mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. Acetone mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.¹ **(R 336.1224, R 336.1225, R 336.1901)**

5. The permittee shall monitor and replace the exhaust filters in EU-PLT2-RIM45 pursuant to the schedule outlined in Appendix 3.2. **(R 336.1910)**
6. The permittee shall record the condition of the exhaust filters on a daily basis using the format pursuant to Appendix 4. **(R 336.1910)**
7. The permittee shall keep a list of all coatings used in the coating processes at the facility. The permittee should indicate the date of the testing and which coatings were randomly tested as required in SC V.2. The permittee shall keep records of the test results. **(R 336.1213(3))**

See Appendices 3.2 and 4

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)

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-045	48 ²	56 ²	R 336.1225 R 336.1901 R 336.2803 R 336.2804 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, Subparts A and PPPP for Surface Coating of Plastic Parts and Products by the initial compliance date.² **(40 CFR Part 63, Subparts A and PPPP)**

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).

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
FG-PLT1-RIM-IMP	Plant 1 - Reaction Injection Molding (RIM) Process with mold release and in-mold painting (Clamp numbers 2, 12, 24, 26, 28, 29, 50, 51, 52) with one paint and mold release mix room and one storage room. Includes one natural gas fired oven with rated capacity of 1 MMBTU/hr.	EU-PLT1-IMP2 EU-PLT1-IMP12 EU-PLT1-IMP24 EU-PLT1-IMP26 EU-PLT1-IMP28 EU-PLT1-IMP29 EU-PLT1-IMP50 EU-PLT1-IMP51 EU-PLT1-IMP52
FG-PLT1-SCL1&2	Plant 1 - Post-Applied Paint. Plastic Parts Coating Operations consisting of two coating lines (Lines No. 1 and 2) with two spray booths, one bake curing oven (No. 9) and parts wiping prior to coating. Lines 1 and 2 have exhaust filters. This flexible group also includes paint storage and mixing rooms.	EU-PLT1-LINE1 EU-PLT1-LINE2
FG-RIMPROCESS	Plant 2 - Three Reaction Injection Molding (RIM) Presses (100-ton, 120-ton, and 300-ton PPD) which process dicyclopentadiene (DCPD) and polyurethane containing materials. When DCPD containing materials are processed, only small amounts of mold release agents are used and no in-mold paint (IMP) is used. When polyurethane containing materials are processed, mold release agents are used, and in-mold paint may also be used. When DCPD containing materials are processed, the VOC emissions are controlled by a carbon adsorption system which has two banks of particulate filters (in series) followed by two carbon filter banks (in series). RIM 42 and RIM 43 use electronic applicators and RIM 44 uses HVLP compliant applicators for the application of the in-mold paints. Acetone and/or VOCs are used for purge and cleanup (EU-CLEANUP). No acetone/VOC purge and cleanup takes place within the three press enclosures.	EU-PLT2-RIM42 EU-PLT2-RIM43 EU-PLT2-RIM44 EU-CLEANUP

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-SHUTTLECLAMP	The Shuttle Clamp Process is an in-mold paint (IMP), reaction injection molding (RIM) process. In addition to the resin, there are also long glass fibers injected into the molds. These long glass fibers add strength to the plastic. This process is a “double shuttle” that allows two parts to be manufactured for each cycle, rather than the prevailing single part produced on the other RIM-IMP processes.	EU-MOLDRELEASE EU-CLAMPBOOTH1 EU-CLAMPBOOTH2 EU-RESIN EU-PAINTKITCHEN EU-FINISHING EU-PARTSWIPE EU-LINECLEANING
FG-ROTARY	Rotary carrier in-mold paint long fiber technology reaction injection molding process.	EU-ROTPAINTKITCHEN EU-ROTFINISHING EU-ROTPARTSWIPE EU-ROTLINECLEANING EU-ROTARYPAINT EU-ROTARYBC EU-ROTARYLFI1 EU-ROTARYLFI2
FG-RULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.	EU-SPACOATING EU-RULE287(2)(c)
FG-MACT-SUBPART_PPPP	<p>All equipment at the stationary source including R 336.1201 exempt equipment involved in surface coating of plastics parts and products that meet the requirements in 40 CFR 63.4481 of 40 CFR 63, Subpart PPPP. Collectively, these plastic parts coating lines comprise the affected source that is subject to the National Emission Standards for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP) Maximum Achievable Control Technology Standards (MACT). This flexible group qualifies as an existing affected source for the purpose of the Subpart PPPP MACT.</p> <p>All coating operations as defined in 40 CFR 63.4581; all storage containers and mixing vessels in which coatings, thinners, and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers, used for conveying waste materials generated by a coating operation are part of the Subpart PPPP MACT source category.</p>	EU-PLT2-LINE1 EU-PLT1-LINE1 EU-PLT1-LINE2 EU-PLT1-IMP2 EU-PLT1-IMP12 EU-PLT1-IMP24 EU-PLT1-IMP26 EU-PLT1-IMP28 EU-PLT1-IMP29 EU-PLT1-IMP50 EU-PLT1-IMP51 EU-PLT1-IMP52 EU-PLT2-RIM42 EU-PLT2-RIM43 EU-PLT2-RIM44 EU-CLEANUP EU-PLT2-RIM45 EU-MOLDRELEASE EU-CLAMPBOOTH1 EU-CLAMPBOOTH2 EU-PAINTKITCHEN EU-FINISHING EU-PARTSWIPE EU-LINECLEANING EU-ROTPAINTKITCHEN EU-ROTLINECLEANING EU-ROTARYPAINT EU-ROTARYBC EU-ROTFINISHING EU-ROTPARTSWIPE EU-SPACOATING

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 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.	EU-COLDCLEANERS EU-PLT1PAINTWASH EU-PLT2MAINTWASH

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

DESCRIPTION

Plant 1 - Reaction Injection Molding (RIM) Process with mold release and in-mold painting (Clamp numbers 2, 12, 24, 26, 28, 29, 50, 51, 52) with one paint and mold release mix room and one storage room. Also includes one natural gas fired oven with rated capacity of 1 MMBTU/hr.

Emission Units: EU-PLT1-IMP2, EU-PLT1-IMP12, EU-PLT1-IMP24, EU-PLT1-IMP26, EU-PLT1-IMP28, EU-PLT1-IMP29, EU-PLT1-IMP50, EU-PLT1-IMP51, EU-PLT1-IMP52

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	42.25 lbs per hour ²	Hourly based on total monthly hours of operation	FG-PLT1-RIM-IMP	SC VI.2	R 336.1702(a)
2. VOC	69.06 tpy ²	12-month rolling time period as determined at the end of each calendar month	FG-PLT1-RIM-IMP	SC VI.2	R 336.1702(a)
3. VOC	34.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP51 & EU-PLT1-IMP52 combined	SC VI.3	R 336.1205(3) R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC content of the coatings	As specified in R 336.1632 (20), Table 66 ²	Pound VOC per gallon of coating (minus water) as applied (instantaneous)	EU-PLT-IMP2 EU-PLT1-IMP12 EU-PLT1-IMP24 EU-PLT1-IMP26 EU-PLT1-IMP28 EU-PLT1-IMP29 EU-PLT1-IMP50	SC V.1 SC VI.7	R 336.1702(d)
2. VOCs	4.6 lb/gal (minus water) ^a as applied ²	Instantaneous	EU-PLT1-IMP51 EU-PLT1-IMP52	SC V.1 SC VI.7	R 336.1702(a)
3. Coatings	12,141 gallons per year ²	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP51 & EU-PLT1-IMP52 combined	SC VI.3	R 336.1205(3)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Mold Releases	7,884 gallons per year ²	12-month rolling time period as determined at the end of each calendar month	EU-PLT1-IMP51 & EU-PLT1-IMP52 combined	SC VI.3	R 336.1205(3)

^a The phrase “minus water” shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compounds. **(R 336.1602(4))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not use in-mold painting in any of the RIM presses in FG-PLT1-RIM-IMP unless all exhaust filters are installed, maintained and operated in a satisfactory manner.² **(R 336.1301, R 336.1331, R 336.1910)**

V. TESTING/SAMPLING

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

1. The permittee shall conduct random testing of non-waterborne coatings, as applied, for the VOC content, solids content and density, using federal Reference Test Method 24 or EPA approved reference method, on a yearly basis with all coatings tested within a five-year period.² **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material used in FG-PLT1-RIM-IMP, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep a separate record of the following for each calendar month:² **(R 336.1702)**
 - a. Usage rate of each material used in FG-PLT1-RIM-IMP.
 - b. Hours of operation of FG-PLT1-RIM-IMP.
 - c. Chemical composition of each material used in FG-PLT1-RIM-IMP including VOC content, in pounds of VOC per gallon, of material used (as applied).
 - d. VOC mass emission calculations verifying an average hourly emission rate based on the total monthly hours of operation.
 - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
3. The permittee shall keep a record of the following for EU-PLT1-IMP51 and EU-PLT1-IMP52, separately and combined, for each calendar month:² **(R 336.1205, R 336.1702)**
 - a. Usage rate of each material used.
 - b. Chemical composition of each material used, including VOC content in pounds of VOC per gallon (minus water and with water) as applied, of material used.

- c. Usage rate of coatings and mold releases, each separately, in gallons per 12-month rolling time period as determined at the end of each calendar month.
 - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
4. The permittee shall monitor and replace exhaust filters in FG-PLT1-RIM-IMP pursuant to the schedule outlined in Appendix 3.2.² (R 336.1910)
 5. The permittee shall record the condition of the exhaust filters on a daily basis using an approved format pursuant to Appendix 4.² (R 336.1910)
 6. The permittee shall monitor and record the total monthly hours of operation of the FG-PLT1-RIM-IMP.² (R 336.1702(a))
 7. The permittee should indicate the date of the testing and which coatings were randomly tested as required in SC V.1. The permittee shall keep records of the test results.² (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

See Appendices 3.2 and 4

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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation for each of EU-PLT1-IMP51 and EU-PLT1-IMP52. (R 336.1201(7)(a))

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-002 (RIM 2)	24 ¹	43 ¹	R 336.1225
2. SV-012 (RIM 12)	24 ¹	43 ¹	R 336.1225
3. SV-024 (RIM 24)	24 ¹	43 ¹	R 336.1225
4. SV-026 (RIM 26)	24 ¹	43 ¹	R 336.1225
5. SV-028 (RIM 28)	24 ¹	43 ¹	R 336.1225

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
6. SV-029 (RIM 29)	24 ¹	43 ¹	R 336.1225
7. SV-050 (RIM 50)	24 ¹	43 ¹	R 336.1225
8. SV-PLT-IMP51 (RIM 51)	36 ¹	45 ¹	R 336.1225
9. SV-PLT-IMP52 (RIM 52)	36 ¹	45 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP for Surface Coating of Plastic Parts and Products by the initial compliance date.² **(40 CFR Part 63, Subparts A and PPPP)**

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).

**FG-PLT1-SCL1&2
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Plant 1 - Post-Applied Paint. Plastic Parts Coating Operations consisting of two coating lines (Lines No. 1 and 2) with two spray booths, one bake curing oven (No. 9) and parts wiping prior to coating. Lines 1 and 2 have exhaust filters. This flexible group also includes paint storage and mixing rooms.

Emission Units: EU-PLT1-LINE1, EU-PLT1-LINE2

POLLUTION CONTROL EQUIPMENT

Exhaust filters for Coating Lines 1 and 2

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total combined Volatile Organic Compounds (VOC) and Acetone (from coating process)	31.7 Tons/year ²	12-month rolling time period as determined at the end of each calendar month	FG-PLT1-SCL1&2	SC VI.1	R 336.1702(a)
2. Total Combined VOC & Acetone (from cleanup and purge only)	8.3 Tons/year ²	12-month rolling time period as determined at the end of each calendar month	Cleanup and purge solvent usage generated from the FG-PLT1-SCL1&2	SC VI.2	R 336.1224 R 336.1225 R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	As specified in R 336.1632 (20), Table 66 ²	Pound VOC per gallon of coating (minus water) as applied (instantaneous)	FG-PLT1-SCL1&2	SC V.1 SC VI.4 SC VI.8	R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall recover and reclaim, recycle or dispose of, in accordance with all applicable regulations, a minimum of 50 percent by weight of all purge solvents used for FG-PLT1-SCL1&2.¹ (R 336.1224)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall apply the coatings utilizing HVLP spray guns or comparable technology with equivalent transfer efficiency. All coating applicators shall be properly installed, maintained, and operated according to

manufacturer's specifications. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**

2. The permittee shall not operate FG-PLT1-SCL1&2 unless their respective exhaust filters are in place and operating properly.² **(R 336.1301, R 336.1901, R 336.1910)**

V. TESTING/SAMPLING

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

1. The permittee shall conduct random testing of any non-waterborne coatings, as applied, for the VOC content, solids content and density, using federal Reference Test Method 24 or EPA approved reference method, on a yearly basis with all coatings tested within a five-year period. **(R 336.1213(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 keep the following information on a monthly basis for each coating line associated with FG-PLT1-SCL1&2:² **(R 336.1225, R 336.1702(a))**
 - a. Coating identification and the coating category, as per R 336.1632.
 - b. Gallons (with water) of each material (coating, reducer, and catalyst) used.
 - c. VOC content (minus water and with water) of each material (coating, reducer, and catalyst) as applied.
 - d. VOC and acetone combined mass emission calculations determining the monthly emission rate in tons per calendar month for each coating line and combined emission rate for all coating lines within FG-PLT1-SCL1&2.
 - e. VOC and acetone combined 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 for each coating line and combined emission rate for all coating lines within FG-PLT1-SCL1&2.
 - f. Hours of operation.
 - g. VOC emission calculations determining compliance with VOC content limits in accordance with Rule 632(20)-Table 66.
2. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with FG-PLT1-SCL1&2:¹ **(R 336.1224, R 336.1225)**
 - a. Gallons of each solvent used and reclaimed.
 - b. VOC and acetone combined mass emission calculations determining the monthly emission rate in tons per calendar month.
 - c. VOC and acetone combined 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.
3. The permittee shall maintain a current material safety data sheet (SDS) of each coating, reducer and catalyst used in the FG-PLT1-SCL1&2 including the weight percent of each compound.² **(R 336.1702(a))**
4. The permittee shall determine the VOC content, water content, density and solids weight and volume fractions of any coating or reducer (as applied) and as received using federal Reference Test Method 24 (solvent based). Upon prior approval of the AQD District Supervisor, these parameters of any coating or reducer may alternatively be determined from the manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1702(a))**
5. The permittee shall monitor and replace the booth exhaust filters in FG-PLT1-SCL1&2 pursuant to the schedule outlined in Appendix 3.1.² **(R 336.1901, R 336.1910)**

6. The permittee shall record the condition of the booth exhaust filters in FG-PLT1-SCL1&2 on a daily basis using an approved format pursuant to Appendix 4.² **(R 336.1901, R 336.1910)**
7. The permittee shall keep records of all inspections, and maintenance. At a minimum, the records shall include the following:² **(R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.1910)**
 - a. The date and results of each inspection completed.
 - b. Name of the person conducting the inspection.
 - c. The date, time operator, and a description of each maintenance performed.
8. The permittee shall keep a list of all coatings used in the coating processes at the facility. The permittee should indicate the date of the testing and which coatings were randomly tested as required in SC V.1. The permittee shall keep records of the test results. **(R 336.1213(3))**

See Appendices 3.1 and 4

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)

The exhaust gases from the stacks listed in the table below shall be discharges unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-011 (LINE1)	34 ¹	43 ¹	R 336.1225
2. SV-010 (LINE 2)	34 ¹	43 ¹	R 336.1225
3. SV-009 (OVEN No. 9)	10 ¹	43 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall dispose of waste coatings, reducers, cleanup solvents and wash solvents in a manner that minimizes the introduction of air contaminants into the outer air.² **(R 336.1370)**
2. The permittee shall capture all purge solvents and waste coatings from the used applicators and store the captured solvents and coatings in closed containers and dispose of them in an acceptable manner in compliance with all applicable rules and regulations.² **(R 336.1201)**
3. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants into the outer air.² **(R 336.1224, (R 336.1370)**

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

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).

**FG-RIMPROCESS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Plant 2 - Three Reaction Injection Molding (RIM) Presses (100-ton, 120-ton, and 300-ton PPD) which process dicyclopentadiene (DCPD) and polyurethane containing materials. When DCPD-containing materials are processed, only small amounts of mold release agents are used and no In-Mold-Paint (IMP) is used. When polyurethane-containing materials are processed, mold release agents are used, and In-Mold Paints may also be used. When DCPD containing materials are processed, the VOC emissions are controlled by carbon adsorption system which has two banks of particulate filters (in series) followed by two carbon filter banks (in series). RIM 42 and RIM 43 use electronic applicators and RIM 44 uses HVLP compliant applicators for the application of the In-Mold-Paints. Acetone and/or VOCs are used for purge and cleanup (EU-CLEANUP). No acetone/VOC purge and cleanup take place within the three press enclosures.

Emission Units: EU-PLT2-RIM42, EU-PLT2-RIM43, EU-PLT2-RIM44, EU-CLEANUP

POLLUTION CONTROL EQUIPMENT

1. Carbon Adsorber No. 2 (CA No.2) controls exhaust from EU-PLT2-RIM42 and EU-PLT2-RIM43. Consists of high efficiency particulate filters followed by two carbon filter banks (in series).
2. Carbon Adsorber No. 3 (CA No.3) controls exhaust from EU-PLT2-RIM44. Consists of high efficiency particulate filters followed by two carbon filter banks (in series).

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC emission rate	15.0 Tons/year ²	12-month rolling time period as determined at the end of each calendar month	Each RIM Process: EU-PLT2-RIM42 EU-PLT2-RIM43	SC VI.5	R 336.1225 R 336.1702(a)
2. VOC emission rate	20.0 Tons/year ²	12-month rolling time period as determined at the end of each calendar month	RIM Process: EU-PLT2-RIM44	SC VI.5	R 336.1225 R 336.1702(a)
3. VOC emission rate	37.3 Tons/year ²	12-month rolling time period as determined at the end of each calendar month	FG-RIMPROCESS including purge and cleanup	SC VI.5 SC VI.6 SC VI.7	R 336.1225 R 336.1702(a)
4. VOC/Acetone emission rate	7.0 Tons/year ¹	12-month rolling time period as determined at the end of each calendar month	EU-CLEANUP	SC VI.7	R 336.1224 R 336.1225

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Combined (total) use of DCPD-containing material	1,770 lbs/hour ¹	Hourly	EU-PLT2-RIM42 EU-PLT2-RIM43 EU-PLT2-RIM44	SC VI.1	R 336.1225 R 336.1901
2. VOC content of In-Mold Paint (IMP) Materials used except mold release agents	4.80 lb/gal (minus water) ^a as applied ²	Per gallon (minus water) as applied	EU-PLT2-RIM42 EU-PLT2-RIM43 EU-PLT2-RIM44	SC V.1	R 336.1702(a)

^a The phrase “minus water” shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compounds. **(R 336.1602(4))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste coatings, catalysts, and solvents, store them in closed containers and dispose of them in an acceptable manner in compliance with all applicable state rules, and federal regulations.² **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants into the outer air.¹ **(R 336.1224, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not process DCPD-containing materials in EU-PLT2-RIM42, EU-PLT2-RIM43, and EU-PLT2-RIM44 unless the carbon adsorption system is installed, maintained, and operated in a satisfactory manner.² **(R 336.1225, R 336.1901, R 336.1910)**
2. The permittee shall not operate EU-PLT2-RIM42, EU-PLT2-RIM43, and EU-PLT2-RIM44 unless a gauge, which measures the pressure drop across the carbon adsorption system, is installed, maintained and operated in a satisfactory manner.² **(R 336.1225, R 336.1901, R 336.1910)**
3. The permittee shall not operate EU-PLT2-RIM42, EU-PLT2-RIM43, and EU-PLT2-RIM44 unless all exhaust filters are installed, maintained, and operated in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1331, R 336.1901)**

V. TESTING/SAMPLING

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

1. The permittee shall conduct random testing of any non-waterborne coatings, as applied, for the VOC content, solids content and density, using federal Reference Test Method 24 or EPA approved reference method, on a yearly basis with all coatings tested within a five-year period. **(R 336.1213(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 calculate and keep records of the DCPD-containing materials processed, on an hourly basis, in EU-PLT2-RIM42, EU-PLT2-RIM43 and EU-PLT2-RIM44 combined. **(R 336.1213(3))**
2. The permittee shall maintain a record of the number of hours per day and the dates in which DCPD is used in FG-RIMPROCESS. **(R 336.1213(3))**

3. The permittee shall maintain a current listing, from the manufacturer, of the chemical composition of each In-Mold Paint, catalyst, mold release agent, DCPD-containing material, polyurethane-containing material, and cleanup material used in EU-PLT2-RIM42, EU-PLT2-RIM43, EU-PLT2-RIM44 and EU-CLEANUP including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD district supervisor. All records shall be made available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
4. The permittee shall complete all required calculations for EU-PLT2-RIM42, EU-PLT2-RIM43, EU-PLT2-RIM44, EU-CLEANUP and FG-RIMPROCESS in a format acceptable to the AQD District Supervisor and make the calculations available by the 15th day of the calendar month, for the previous month, unless otherwise specified in any recordkeeping, reporting or notification special condition.² **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
5. The permittee shall keep the following information, on a monthly basis, separately for EU-PLT2-RIM42, EU-PLT2-RIM43, EU-PLT2-RIM44:
 - a. Gallons (with water) of each in-mold paint, catalyst, DCPD containing material and mold release agent used.
 - b. The mixing ratio of catalyst to coating.
 - c. VOC content (minus water and with water) of each In-Mold-Paint, as applied.
 - d. VOC content (minus water and with water) of each mold release agent used.
 - e. VOC content (minus water and with water) of each catalyst used.
 - 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 records shall be kept in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.² **(R 336.1225, R 336.1702, R 336.1901)**

6. The permittee shall keep the following information, on a monthly basis, for FG-RIMPROCESS:
 - a. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - b. 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 records shall be kept in a format acceptable to the AQD District Supervisor and made available to the Department upon request.² **(R 336.1225, R 336.1702, R 336.1901)**

7. The permittee shall keep the following information, on a monthly basis, for EU-CLEANUP:
 - a. Gallons and type of each cleanup material used.
 - b. Where applicable, gallons and type of cleanup material reclaimed.
 - c. VOC and acetone combined mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. VOC and acetone combined 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 records shall be kept in a format acceptable to the AQD District Supervisor and made available to the Department upon request.² **(R 336.1224, R 336.1225)**

8. The permittee shall determine the VOC content, water content, and density of any In-Mold-Paint, catalyst, DCPD-containing material, and mold release agent, as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from the manufacturer's formulation data. If the Method 24 and formulation data values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1224, R 336.1225, R 336.1702(a))**
9. The permittee shall implement the periodic monitoring program consisting of appropriate monitoring data as outlined in Appendix 5 for each carbon adsorption system. If breakthrough is detected, the permittee shall not operate the system for more than five (5) working days or until the carbon filter in the first stage contactor has been replaced with the carbon filters from the second stage and second stage filters with fresh carbon. Any request for a change in the monitoring frequency shall be submitted to the AQD District Supervisor for review and approval.² **(R 336.1225, R 336.1901, R 336.1910)**
10. The permittee shall keep on file the periodic monitoring program, including the pressure drop monitoring plan, for each carbon adsorption system and make them available to the Department upon request.² **(R 336.1225, R 336.1901, R 336.1910)**
11. The permittee shall keep records of all inspections, maintenance, and change-outs of each carbon adsorption system. At a minimum, the records shall include the following: **(R 336.1213(3))**
 - a. The date and results of each inspection completed.
 - b. Condition of the carbon filters.
 - c. Name of the person conducting the inspection.
 - d. Date, Time, and Operator when Carbon Filter Change-out was done.
 - e. Pressure drop reading.
 - f. The total amount of carbon used per change-out.
 - g. The date, time, operator, and a description of each maintenance performed.
12. The permittee shall monitor and replace the RIM Booth exhaust filters in EU-PLT2-RIM42, EU-PLT2-RIM43, and EU-PLT2-RIM44 pursuant to the schedule outlined in Appendix 3.2.² **(R 336.1901, R 336.1910)**
13. The permittee shall record the condition of the RIM booth exhaust filters in EU-PLT2-RIM42, EU-PLT2-RIM43, and EU-PLT2-RIM44 on a daily basis using an approved format pursuant to Appendix 4.² **(R 336.1901, R 336.1910)**
14. The permittee shall monitor and record the total hours of operation per month of the FG-RIMPROCESS.² **(R 336.1702(a))**
15. The permittee shall keep a list of all coatings used in the coating processes at the facility. The permittee should indicate the date of the testing and which coatings were randomly tested as required in SC V.1. The permittee shall keep records of the test results. **(R 336.1213(3))**

See Appendices 3.2, 4 and 5

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))**

- 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)

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-042-CARBON	30 ²	35 ²	R 336.1225 R 336.1901 40 CFR 52.21 (c) & (d)
2. SV-042a-IMP	39 ²	44 ²	R 336.1225 R 336.1901 40 CFR 52.21 (c) & (d)
3. SV-043-IMP	39 ²	44 ²	R 336.1225 R 336.1901 40 CFR 52.21 (c) & (d)
4. SV-044-CARBON	34 ²	35 ²	R 336.1225 R 336.1901 40 CFR 52.21 (c) & (d)
5. SV-044a-IMP	64 ²	44 ²	R 336.1225 R 336.1901 40 CFR 52.21 (c) & (d)

Note: When the carbon adsorption systems are used, EU-PLT2-RIM42 and EU-PLT2-RIM43 exhaust through stack SV-042-CARBON and EU-PLT2-RIM44 exhausts through stack SV-044-CARBON. When the carbon adsorption systems are not used, EU-PLT2-RIM42 exhausts through stack SV-042a-IMP, EU-PLT2-RIM43 exhausts through SV-043-IMP, and EU-PLT2-RIM44 exhausts through SV-044a-IMP

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products by the initial compliance date.² **(40 CFR, Part 63, Subparts A and PPPP)**

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).

**FG-SHUTTLECLAMP
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Reaction Injection Molding and In-mold paint operations associated with the shuttle clamp process. Includes two spray booths and associated process and process equipment which are used to manufacture and paint plastic parts.

Emission Units: EU-MOLDRELEASE, EU-CLAMPBOOTH1, EU-CLAMPBOOTH2, EU-RESIN, EU-PAINTKITCHEN, EU-FINISHING, EU-PARTSWIPE, EU-LINECLEANING

POLLUTION CONTROL EQUIPMENT

Fabric filters in the spray booths

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	40.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	All equipment combined in FG-SHUTTLECLAMP	SC VI.3	R 336.1225 R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	4.5 lb/gal ² (minus water) ^a as applied	Instantaneous	Coatings (paint/catalyst mixture) associated with FG-SHUTTLECLAMP	SC V.1	R 336.1702(a)
2. Barrier Coat	1,111 lbs/day ¹	Calendar day	FG-SHUTTLECLAMP	SC VI. 4	R 336.1225
3. LFI Resin	2,933 lbs/day ¹	Calendar day	FG-SHUTTLECLAMP	SC VI. 4	R 336.1225

^a The phrase "minus water" shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compounds.² (R 336.1602(4))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall keep the bay doors closed at all times except when access is absolutely necessary. The bay doors are located in the building area where the resin operations, associated with the FG-SHUTTLECLAMP process, are conducted.¹ (R 336.1225)
2. The permittee shall capture all waste materials (coatings, catalyst(s), cleanup solvents, purge solvents, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, catalyst(s), cleanup solvents, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1225, R 336.1702(a))

3. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² **(R 336.1224, R 336.1370)**
4. The permittee shall handle all VOC containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
5. The permittee shall place all cloths used in the wipedown operations associated with FG-SHUTTLECLAMP into closed containers. The permittee shall keep containers closed at all times except when operator access is necessary.² **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booths associated with FG-SHUTTLECLAMP unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1331, R 336.1901, R 336.1910)**
2. The permittee shall equip and maintain the spray booths associated with FG-SHUTTLECLAMP with automatic HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any coating and catalyst material used, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1225, R 336.1702(a), R 336.1901)**
2. Upon request by the AQD District Supervisor, the permittee shall perform a federal Reference Test Method 24 on the LFI resin and barrier coat, each separately, used in FG-SHUTTLECLAMP. This testing shall be done at the owner's expense, in accordance with Department requirements. The results of this testing shall be used to verify the MDI emission factors in Appendix 7. Verification of these emission factors includes the submittal of a complete report of the test results to the AQD District Supervisor within 30 days following the last date of the test. **(R 336.1213(3(a)))**
3. The permittee shall conduct random testing of any non-waterborne coatings, as applied, for the VOC content, solids content and density, using federal Reference Test Method 24 or EPA approved reference method, on a yearly basis with all coatings tested within a five-year period. **(R 336.1213(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 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.² **(R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (i.e., coating, catalyst, line cleaning solvent, parts wiping, mold release agent, etc.), including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), R 336.1901)**

3. The permittee shall keep the following information on a monthly basis for all operations associated with FG-SHUTTLECLAMP:
 - a. Gallons (with water), or pounds, of each material (i.e., coating, catalyst, mold release agent, line cleaning solvent, parts wiping, etc.) used and total reclaimed.
 - b. VOC content (minus water and with water) of each material (i.e., coating, catalyst, mold release agent, line cleaning solvent, parts wiping, etc.) as applied.
 - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month. See Appendix 7 for VOC (MDI) emissions from barrier coat and LFI resin usage.
 - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. See Appendix 7 for VOC (MDI) emissions from barrier coat and LFI resin usage.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**

4. The permittee shall keep the following information on a daily basis for FG-SHUTTLECLAMP:
 - a. Gallons or pounds of barrier coat used.
 - b. Gallons or pounds of LFI resin used.
 - c. The total amount, in pounds, of barrier coat used to demonstrate compliance with SC II.2.
 - d. The total amount, in pounds, of LFI resin used to demonstrate compliance with SC II.3.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request.¹ **(R 336.1225)**

5. The permittee shall monitor and replace the exhaust filters in FG-SHUTTLECLAMP pursuant to the schedule outlined in Appendix 3.2. **(R 336.1910)**
6. The permittee shall record the condition of the exhaust filters on a daily basis using the format pursuant to Appendix 4. **(R 336.1910)**
7. The permittee shall keep a list of all coatings used in the coating processes at the facility. The permittee should indicate the date of the testing and which coatings were randomly tested as required in SC V.3. The permittee shall keep records of the test results. **(R 336.1213(3))**

See Appendices 3.2, 4 and 7

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)

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. SV-CLAMPBOOTH1	36 ²	45 ²	R 336.1225 R 336.1901 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)
2. SV-CLAMPBOOTH2	36 ²	45 ²	R 336.1225 R 336.1901 R 336.2803 R 336.2804 40 CFR 52.21(c) and (d)

- The exhaust gases from the finishing operations associated with FG-SHUTTLECLAMP shall not be discharged to the ambient air at any time.² **(R 336.1205, R 336.1301, R 336.1331, R 336.1901)**

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP for Surface Coating of Plastic Parts and Products by the initial compliance date.² **(40 CFR Part 63, Subparts A and PPPP)**

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).

**FG-ROTARY
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Rotary carrier in-mold paint long fiber technology reaction injection molding process.

Emission Units: EU-ROTPAINTKITCHEN, EU-ROTFINISHING, EU-ROTPARTSWIPE, EU-ROTLINECLEANING, EU-ROTARYPAINT, EU-ROTARYBC, EU-ROTARYLFI1, EU-ROTARYLFI2

POLLUTION CONTROL EQUIPMENT

Particulate emissions from EU-ROTARYPAINT are controlled by high efficiency dry fabric filters.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	80.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	All equipment combined in FG-ROTARY	SC VI.3	R 336.1702(a)
2. 2,4- pentanedione (CAS No. 123- 54-6)	42.3 lb/day ¹	Calendar day	EU-ROTARYPAINT	SC VI.4	R 336.1225(1)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coating Mixture	4.2 lb VOC/gal (minus water) ^a as applied ²	Instantaneous	Coatings (paint/catalyst mixture) associated with FG-ROTARY	SC V.1	R 336.1702(a)

^a The phrase “minus water” shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compound. (R 336.1602(4))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste materials (coatings, catalyst(s), cleanup solvents, purge solvents, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, catalyst(s), cleanup solvents, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1225, R 336.1702(a))
- The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² (R 336.1224, R 336.1370)
- The permittee shall handle all VOC containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² (R 336.1224, R 336.1225, R 336.1702(a))

4. The permittee shall place all cloths used in the wipe down operations associated with FG-ROTARY into closed containers. The permittee shall keep containers closed at all times except when operator access is necessary.² **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-ROTARYPAINT unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1331, R 336.1910)**
2. The permittee shall equip and maintain EU-ROTARYPAINT with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**
3. The permittee shall equip and maintain EU-ROTARYBC with mix-head applicators that have equivalent transfer efficiency to HVLP applicators.² **(R 336.1702(a))**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any coating and catalyst material used, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

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.² **(R 336.1225, R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (i.e., coating, catalyst, line cleaning solvent, parts wiping, mold release agent, etc.), including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information on a monthly basis for all operations associated with FG-ROTARY:
 - a. Gallons (with water), or pounds, of each material (i.e., coatings, catalyst, mold release agent, line cleaning solvent, parts wiping, etc.) used and reclaimed.
 - b. VOC content (minus water and with water) of each material (i.e., coating, catalyst, mold release agent, line cleaning solvent, parts wiping, etc.) as applied.
 - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**

4. The permittee shall keep the following information on a daily basis for EU-ROTARYPAINT:
 - a. Gallons (with water) of each 2, 4-pentanedione (CAS No. 123-54-6) containing material used.
 - b. Where applicable, gallons (with water) of each 2, 4-pentanedione (CAS No. 123-54-6) containing material reclaimed.
 - c. The 2, 4-pentanedione (CAS No. 123-54-6) content (with water) in pounds per gallon of each material used.
 - d. 2, 4-pentanedione (CAS No. 123-54-6) mass emission calculations determining the daily emission rate in pounds per calendar day.

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

See Appendices 3 and 4

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)

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPAIN1	24 ¹	45 ¹	R 336.1225
2. SVPAIN2	24 ¹	45 ¹	R 336.1225

3. The exhaust gases from EU-ROTARYBC, EU-ROTARYLFI1, EU-ROTARYLFI2, and EU-ROTFINISHING shall not be discharged to the ambient air at any time. **(R 336.1301, R 336.1331)**

IX. OTHER REQUIREMENT(S)

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

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).

**FG-RULE287(2)(c)
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016: EU-RULE287(2)(c), EU-SPACOATING

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 Gallons/month (minus water as applied)	Calendar month	Each emission unit	R 336.1287(2)(c)(i)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- Any exhaust system installed on or after December 20, 2016, that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer’s specifications, or the permittee develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. All emission units installed before December 20, 2016, with an exhaust system that serves only coating spray equipment must have a properly installed and operated particulate control system. (R 336.1213(2), R 336.1287(2)(c)(ii), R 336.1910)

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 records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 287(2)(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. **(R 336.1213(3))**
 - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(2)(c)(iii))**
 - b. Documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. **(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

FG-MACT-SUBPART_PPPP FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

- An affected source is a new source if construction of the source commenced after December 4, 2002 by installing new coating equipment; and
- The new coating equipment is used to coat plastic parts and products at a source where no plastic parts surface coating was previously performed; or
- The new coating equipment is used to perform plastic parts and products coating in a subcategory that was not previously performed. **(40 CFR 63.4482(c))**
- An affected source is reconstructed if it meets the criteria as defined in 40 CFR 63.2. **(40 CFR 63.4482(d))**
- An affected source exists if it is not new or reconstructed. **(40 CFR 63.4482(e))**

For an existing affected source, the compliance date is April 19, 2007. **(40 CFR 63.4483(b))**

All equipment at the stationary source including R 336.1201 exempt equipment involved in surface coating of plastics parts and products that meet the requirements in 40 CFR 63.4481 of 40 CFR Part 63, Subpart PPPP. Collectively, these plastic parts coating lines comprise the affected source that is subject to the National Emission Standards for Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP) Maximum Achievable Control Technology Standards (MACT). This flexible group qualifies as an existing affected source for the purpose of the Subpart PPPP MACT.

All coating operations as defined in 40 CFR 63.4581; all storage containers and mixing vessels in which coatings, thinners, and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers, used for conveying waste materials generated by a coating operation are part of the Subpart PPPP MACT source category.

Emission Units: EU-PLT2-LINE1, EU-PLT2-RIM45, EU-PLT1-IMP2, EU-PLT1-IMP12, EU-PLT1-IMP24, EU-PLT1-IMP26, EU-PLT1-IMP28, EU-PLT1-IMP29, EU-PLT1-IMP50, EU-PLT1-IMP51, EU-PLT1-IMP52, EU-PLT1-LINE1, EU-PLT1-LINE2, EU-PLT2-RIM42, EU-PLT2-RIM43, EU-PLT2-RIM44, EU-CLEANUP, EU-MOLDRELEASE, EU-CLAMPBOOTH1, EU-CLAMPBOOTH2, EU-RESIN, EU-PAINTKITCHEN, EU-FINISHING, EU-PARTSWIPE, EU-LINECLEANING, EU-ROTPAINTKITCHEN, EU-ROTLINECLEANING, EU-ROTARYPAINT, EU-ROTARYBC, EU-ROTFINISHING, EU-ROTPARTSWIPE, EU-SPACOATING

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

3. The permittee shall determine compliance with applicable emission limits according to the requirements in 40 CFR 63.4540 through 63.4568. **(40 CFR 63.4490(b))**
4. The permittee shall include all coatings (as defined in 40 CFR 63.4581), thinners, and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4490. **(40 CFR 63.4491)**
5. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.4490 using at least one of the following three options, which are listed in 40 CFR 63.4491(a) through (c):
 - a. Compliant material option,
 - b. Emission rate without add-on controls option, or
 - c. Emission rate with add-on controls option.

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

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

II. MATERIAL LIMIT(S)

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

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

* Determined according to 40 CFR 63.4541(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

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

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.4541, 40 CFR 63.4551, or 40 CFR 63.4561. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months. **(40 CFR 63.4483, 40 CFR 63.4540, 40 CFR 63.4550, 40 CFR 63.4560)**
2. The permittee shall keep all records required by 40 CFR 63.4530 in the format and timeframes outlined in 40 CFR 63.4531. **(40 CFR 63.4542(d), 40 CFR 63.4552(d), 40 CFR 63.4563(j))**
3. The permittee shall maintain, at a minimum, the following records for each compliance period:
 - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart PPPP, and the documentation supporting each notification report. **(40 CFR 63.4530(a))**
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. **(40 CFR 63.4530(b))**
 - c. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.4530(c)(1))**
 - d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. **(40 CFR 63.4530(c)(2))**
 - e. For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. **(40 CFR 63.4530(c)(3))**
 - f. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. **(40 CFR 63.4530(d))**
 - g. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period. **(40 CFR 63.4530(e))**

- h. The mass fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.4530(f))**
 - i. The information specified in 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4). **(40 CFR 63.4530(g))**
 - j. The date, time, and duration of each deviation. **(40 CFR 63.4530(h))**
- 4. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.4490, for each compliance period, using Equation 1 of 40 CFR 63.4541. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.4541(a). **(40 CFR 63.4542)**
 - 5. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period according to 40 CFR 63.4551(a) through (g). **(40 CFR 63.4552)**

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. For the compliant material option, the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a) is a deviation that must be reported as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5). **(40 CFR 63.4542(b))**
- 5. For the emission rate without add-on controls, if the organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490, the permittee shall report this as a deviation as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6). **(40 CFR 63.4552(b))**
- 6. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.4510. **(40 CFR Part 63, Subparts A and PPPP)**
- 7. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520. Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating operations were in compliance. **(40 CFR 63.4520, 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f))**

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:

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP for Surface Coating of Plastic Parts and Products by the initial compliance date. **(40 CFR Part 63, Subparts A and PPPP)**
2. The permittee shall calculate emission limit as specified in SC I.1 or SC 1.2 for each coating operation. **(R 336.1213(3))**

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).

FG-COLDCLEANERS 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 Units: EU-COLDCLEANERS, EU-PLT1PAINTWASH, EU-PLT2MAINTWASH

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

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	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
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EU-PLT2-LINE1, FG-PLT1-RIM-IMP, FG-PLT1-SCL1&2, FG-RIMPROCESS, EU-PLT2-RIM45, FG-ROTARY, and FG-SHUTTLECLAMP.

EXHAUST FILTERS: REACTION INJECTION MOLDING (RIM) & PAINT BOOTHS

All emission units covered by this ROP utilize dry filters on either post-applied coating or in-mold coating applications. The permittee shall monitor and replace the filters as follows:

1. POST-APPLIED PAINT EXHAUST FILTERS (Two stages of booth exhaust filters are used)
 - a. Replace Stage One filters at a minimum of once every 24 operating hours in each booth.
 - b. Replace Stage Two filters in Booth 1 (EU-PLT1-LINE1) and Booth 2 (EU-PLT1-LINE2) at a minimum of once every 48 operating hours, and Plant 2-Line 1 (EU-PLT2-LINE1), at minimum of once every 80 operating hours.
2. IN-MOLD PAINT EXHAUST FILTERS
 - a. Replace filters at minimum of once every 24 operating hours in each RIM booth when the RIM Process utilizes In-Mold Painting.

Appendix 4. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements for the exhaust filters associated with the Carbon Adsorption Systems, RIM exhaust filters and post-applied coating spray booths referenced in EU-PLT2-LINE1, EU-PLT2-RIM45, FG-PLT1-RIM-IMP, FG-RIMPROCESS, FG-ROTARY, and FG-SHUTTLECLAMP. Alternative formats must be approved by the AQD District Supervisor.

Following records shall be compiled into reports covering a six-month reporting period.

EXHAUST FILTERS: In-Mold Paint (IMP)/Post Applied Paint (PAP) and Carbon Adsorption Control Systems

The permittee shall record the condition of the exhaust filters on a daily operating basis for all emission units in this ROP processing In-Mold Painting (IMP) and Post Applied Painting (PAP). The permittee shall record the condition of the exhaust filters on a weekly operating basis for Carbon Adsorption Systems No. 2 and No. 3 when DCPD-containing materials are processed.

The following information should be recorded:

- A. Date and Time of the inspection
- B. Name of the person conducting the inspection
- C. Identification of the Booth/RIM emission unit
- D. Verification that all filters are in place (Y/N)
- E. Condition of the filters
- F. Verification that all spare filters are available (Y/N)
- G. Stage 1 Filter Replaced (Y/N)
- H. Stage 2 Filter Replaced (Y/N)
- I. Corrective actions/comments

Appendix 5. Testing Procedures

VOC Concentration and Pressure Drop Monitoring Plans for Carbon Adsorption Systems in Plant No. 2

VOC Concentration Monitoring Plan:

1. Monitored Parameter:
 - a. Average VOC outlet concentration of combined exhaust gases from RIM 42 and RIM 43 in Plant 2
 - b. Average VOC outlet concentration of exhaust gases from RIM44 in Plant 2
2. Monitoring Device: MiniRae 2000 PID
3. Monitoring Location: Held at the center of flow, three (3) feet aboveground between the carbon adsorption unit outlet chamber and the wall
4. Frequency: Every third operating day that DCPD containing material is used in either RIM 42 or RIM 43, every third operating day that DCPD containing material is used in both RIM 42 and RIM 43 simultaneously and/or every third operating day that DCPD containing material is used in RIM 44
5. Duration: Five (5) minutes (monitored while RIM 42, RIM 43 and/or RIM 44 are in use)
6. Method for obtaining Concentration: MiniRae 2000 running average feature (records a value every second and determines the average based on all readings during the sampling period)
7. Corrective Action Trigger: Five (5) minute VOC average outlet concentration of 25 ppm for the control system on RIM 42 and RIM 43 (CA No. 2), 35 ppm for the control system on RIM 44 (CA No. 3)
8. Corrective Action: Replace the carbon filters in the first stage contactor with the carbon filters from the second stage and replace filters in the second stage are with fresh carbon filters
9. Corrective Action Period: Within five (5) working days of exceeding the corrective action trigger or once every six months, whichever is more frequent
10. Recordkeeping: Manually record the following:
 - a. Carbon filter outlet average VOC concentration reading of exhaust gases,
 - b. Carbon filter change out,
 - c. MiniRae 2000 calibration records, and
 - d. Breakthrough incidents

These items shall be recorded on a log sheet immediately after sampling and change out and kept on file for a minimum of five years.
11. QA/QC Procedures: Calibrate MiniRae 2000 before each use and maintain according to the manufacturer's Operation and Maintenance Manual.
12. Malfunction Plan: Rent a MiniRae 2000 or an equivalent device while the facility model is being repaired

- 13. Responsible Employee: VOC Concentration = Plant 2 Supervisor or Plant 2 Process Engineer
Carbon Change out = EHS Representative
- 14. Verification of monitoring and recordkeeping: EHS Representative
- 15. Training: On the job training by EHS Representative
- 16. Written Standard Operating Procedure: Kept in file

Pressure Drop Monitoring Plan

- 1. Monitoring Parameter: Pressure drop across carbon adsorption system filters
- 2. Monitoring Devices: Manometers
- 3. Location: Taps at inlet and outlet of each compartment and/or entire unit
- 4. Frequency: Weekly, when DCPD containing materials are used in EU-PLT2-RIM42, EU-PLT2-RIM43 and/or EU-PLT2-RIM44
- 5. Method of Reading Pressure Drop: Visual observation of the manometer
- 6. Recordkeeping: Manually recorded on a log sheet immediately after each reading and kept on file for five years
- 7. Corrective Action Trigger: Upper Limit = 4 inches of water column ("WC)
Lower Limit = 0.5 "WC
- 8. Corrective Action: Identify and correct the problem or replace the manometer
- 9. Corrective Action Period: 12 hours to inspect and isolate the problem and five operating days to develop and implement a solution
- 10. QA/QC Procedure: Calibrate, maintain and operate manometers according to the manufacturer's recommendations
- 11. Malfunction Plan: Purchase and properly install a new device within five operating days
- 12. Responsible Employee: Plant 2 Supervisor or Plant 2 Process Engineer
- 13. Verification of monitoring and recordkeeping: EHS Representative
- 14. Training: Not required
- 15. Written Standard Operating Procedure: Not required

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-B5854-2015. 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-B5854-2015a is being reissued as Source-Wide PTI No. MI-PTI-B5854-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
196-19	202000037*	Incorporate PTI 196-19 into the ROP. PTI 196-19 includes two new emission units: EU-PLT1-IMP51: Plant 1 - Clamp No. 51 (LRM-1) - A 75-ton Cincinnati Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts. EU-PLT1-IMP52: Plant 1 - Clamp No. 52 (LRM-1) - A 75-ton Cincinnati Reaction Injection Molding (RIM) process with in-mold painting (IMP). Manufactures and coats miscellaneous plastic parts. Added EU-PLT1-IMP51 and EU-PLT1-IMP52 to flexible groups FG-PLT1-RIM-IMP and FG-MACT-SUBPART_PPPP. Update conditions for flexible group FG-PLT1-RIM-IMP conditions to accommodate the two new emission units.	EU-PLT1-IMP51 EU-PLT1-IMP52 FG-PLT1-RIM-IMP FG-MACT-SUBPART_PPPP
90-16	201600191	Incorporate PTI 90-16 into the ROP, which is for a new "rotary carrier system" injection molding line.	FG-ROTARY EU-ROTPAINTKITCHEN EU-ROTLINECLEANING EU-ROTARYPAINT EU-ROTARYBC EU-ROTARYLFI1 EU-ROTARYLFI2 EU-ROTFINISHING EU-ROTPARTSWIPE
NA	201600192	Request to remove emission units EU-PLT1-IMP6, EU-PLT1-LINE3, EU-PLT1-LINE4, EU-PLT1-LINE5, EU-PLT1-LINE6, in Plant 1, since they have been dismantled and removed from the facility, and update the wording in the Emission Unit Summary table.	EU-PLT1-IMP6 EU-PLT1-LINE3 EU-PLT1-LINE4 EU-PLT1-LINE5 EU-PLT1-LINE6 EU-PLT1-IMP2 EU-PLT1-IMP5 EU-PLT1-IMP12 EU-PLT1-IMP24 EU-PLT1-IMP26 EU-PLT1-IMP28 EU-PLT1-IMP29 EU-PLT1-IMP50 EU-PLT1-LINE1 EU-PLT1-LINE2

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FG-SHUTTLECLAMP.

Calculation Information for MDI (CAS NO. 101-68-8) Emissions from FG-SHUTTLECLAMP

MDI (CAS No. 101-68-8) Emission Factors for:

Barrier Coat VOC (MDI) Emission Factor = 0.031% (by weight)

Example Calculation:

VOC (MDI) Emissions from Barrier Coat usage, lbs/month = 0.031% VOC (MDI) x Y lbs Barrier Coat used/month

LFI Resin VOC (MDI) Emission Factor = 0.005% (by weight)

Example Calculation:

VOC (MDI) Emissions from LFI Resin usage, lbs/month = 0.005% VOC (MDI) x Z lbs LFI Resin used/month. These emission factors are to be used in calculating VOC (MDI) emissions from the barrier coat and LFI resin used (only) in the FG-SHUTTLECLAMP process, as detailed in SC VI.3. If alternate emission factors are tested and determined to be acceptable to the AQD, the tested emission factors may be used in calculating the VOC (MDI) emissions from the barrier coat and LFI resin.

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.