From:	Baweja, Karen
To:	EGLE-ROP
Subject:	N2079 - ROP Renewal Application
Date:	Tuesday, April 19, 2022 11:23:30 AM
Attachments:	ROP Renewal Application Form Section 1.pdf ROP Renewal Application Form Section 2.pdf N2079 Final 11-2-17 - Markup Copy.doc PTI 110-18A.pdf PTI 151-19A.pdf Paint East O&M Plan 4-15-2022.pdf Paint West O&M Plan 11-18-2019.pdf Paint Central O&M Plan 11-11-2021.pdf PE RTO CAM.docx PW RTO CAM.doc PC RTO CAM.docx Barden Plate MA - OM Plan 4-8-2022.pdf

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Good Morning,

Attached is the electronic version of the ROP Application Package for the renewal of MI-ROP-N2079-2017. The current permit expires November 2, 2022.

Hard copy will arrive at the Grand Rapids district office tomorrow.

Let me know if there are any questions.

Thank you,

Karen Baweja
Lacks Enterprises, Inc.
Environmental Manager
k.baweja@lacksenterprises.com
616.956.7259 Work
616.481.1926 Cell

EGLE

RENEWABLE OPERATING PERMIT
RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
N2079	3714	336390	MI-ROP-N2079-2017	2

Source Name: Lacks Enterprises, Inc. (Barden Plater)

Street Address: 4375 52nd Street

City	State	ZIP Code	County
Kentwood	MI	49512	Kent

Section/Town/Range (if address not available):

Source Description: Surface coating of plastic automotive parts.

☐ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
Lacks Enterprises, Inc.	2

Mailing address (☐ check if same as source address): 5460 Cascade Rd

City	State	ZIP Code	County	Country
Grand Rapids	MI	49546	Kent	USA

☐ Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

SRN: N2079	Section Number (if applicable): 2

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name	Title			
Karen Baweja	Environmental Manager			
Company Name & Mailing address (☐ check if same as source address)				
Lacks Enterprises Plastic Plate Kraft 5675 Kraft Ave. SE				
City	State	ZIP Code	County	Country
Grand Rapids	MI	49512	Kent	USA
Phone number	E-mail address			
616-956-7259	k.baweja@lacksenterprises.com			

Contact 2 Name (optional)	Title			
Ken Bailey	Director of EHS and Protective Services			
Company Name & Mailing address (☐ check if same as source address)				
Lacks Enterprises 4949 Broadmoor Ave. SE				
City	State	ZIP Code	County	Country
Kentwood	MI	49512	Kent	USA
Phone number	E-mail address			
616-554-2307	k.bailey@lacksenterprises.com			

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name	Title			
Jim Morrissey	General Plant Manager			
Company Name & Mailing address (☐ check if same as source address)				
Lacks Trim Systems Airlane North 4260 Airlane Road SE				
City	State	ZIP Code	County	Country
Kentwood	MI	49512	Kent	USA
Phone number	E-mail address			
616-554-3479	j.morrissey@lackstrim.com			

Responsible Official 2 Name (optional)	Title			
Joe Sullivan	Director of Operations			
Company Name & Mailing address (☐ check if same as source address)				
Lacks Enterprises 5460 Cascade Rd SE				
City	State	ZIP Code	County	Country
Grand Rapids	MI	49546	Kent	USA
Phone number	E-mail address			
616-554-1516	j.sullivan@lackstrim.com			

☐ Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

SRN: N2079	Section Number (if applicable): 2

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

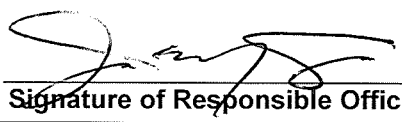
Listing of ROP Application Contents. Check the box for the items included with your application.	
☒ Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	☐ Compliance Plan/Schedule of Compliance
☒ Mark-up copy of existing ROP using official version from the AQD website (required)	☐ Stack information
☒ Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	☐ Acid Rain Permit Initial/Renewal Application
☐ Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	☐ Cross-State Air Pollution Rule (CSAPR) Information
☐ MAERS Forms (to report emissions not previously submitted)	☐ Confidential Information
☐ Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	☒ Paper copy of all documentation provided (required)
☐ Compliance Assurance Monitoring (CAM) Plan	☒ Electronic documents provided (optional)
☒ Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	☐ Other, explain:

Compliance Statement	
This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	☒ Yes ☐ No
The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.	
If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.	

Name and Title of the Responsible Official (Print or Type)

Jim Morrissey, General Plant Manager

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.



Signature of Responsible Official

4-19-2020

Date

SRN: N2079	Section Number (if applicable): 2

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☐ Yes ☒ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☒ No ☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☒ Yes ☐ No PTI 151-19A
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☐ Yes ☒ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No ☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	☐ Yes ☒ No ☐ Yes ☒ No ☐ ☐
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☒ Yes ☐ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☐ Yes ☒ No
☐	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-**	

SRN: N2079	Section Number (if applicable): 2

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☐ Yes ☒ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: **AI-**

SRN: N2079	Section Number (if applicable): 2

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☐ Yes ☒ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No
Comments:	

☐ Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: **AI-**

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. If No, go to Part G. ☒ Yes ☐ No

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed
151-19A	EUPREETCHTANK	A pre-etch tank containing propylene carbonate and y-butyrolactone used to pre-etch plastic parts prior to plating for the production of exterior plastic automotive parts.	September 1, 2020 / March 17, 2022

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. ☐ Yes ☒ No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. ☒ Yes ☐ No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identity the stack(s) that were not reported on the applicable MAERS form(s). ☐ Yes ☒ No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. ☐ Yes ☒ No

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**151-19A

SRN: N2079	Section Number (if applicable): 2

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.

If Yes, identify the emission units in the table below. If No, go to Part H. ☐ Yes ☒ No

Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	**Emission Unit Description – *Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices***	**Date Emission Unit was Installed/ Modified/ Reconstructed**
☐ Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
☐ Rule 287(2)(c) surface coating line		
☐ Rule 290 process with limited emissions		

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: **AI-**

SRN: N2079	Section Number (if applicable): 2

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If Yes, answer the questions below.	☐ Yes ☐ No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If Yes, describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	☐ Yes ☒ No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If Yes, identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	☐ Yes ☒ No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If Yes, on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify each state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	☐ Yes ☒ No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If Yes, list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	☐ Yes ☒ No
H6. Does the source propose to add, change and/or delete **source-wide** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H7. Are you proposing to **streamline** any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	☐ Yes ☒ No

SRN: N2079	Section Number (if applicable): 2

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
☐ Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-**	

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: N2079	Section Number (if applicable): 2

1. Additional Information ID
AI-141-19A

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Permit to install 151-19A for EUPREETCHTANK is included with this application.

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

EFFECTIVE DATE: November 2, 2017

ISSUED TO

Lacks Enterprises, Inc.

State Registration Number (SRN): N2079

LOCATED AT

4375 52nd Street, Kentwood, Michigan 49512

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N2079-2017

Expiration Date: November 2, 2022

Administratively Complete ROP Renewal Application
Due Between May 2, 2021 and May 2, 2022

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 Michigan Air Pollution Control Rule 210(1), 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-N2079-2017

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, 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 Environmental Quality

_____

Heidi Hollenbach, Grand Rapids 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 Environmental Quality (MDEQ) 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 will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or are 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.

Section 1 – 52nd Street Paint East; 52nd Street Paint West; 52nd Street Paint Central~~Mold~~; and Barden Distribution

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 states 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. **(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(8))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.

37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
    c. 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, MDEQ.[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, MDEQ, 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:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	249.0 tons per year	12-month rolling time period as determined at the end of each calendar month.	All process equipment at the stationary source including equipment covered by other permits, grand-fathered equipment, and exempt equipment	SC VI.1, VI.2	**R 336.1213(2)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data. The VOC content of any other material may be determined from Safety Data Sheet. **(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 last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1213(3))**

2. The permittee shall calculate and record the stationary Source-wide emission rates in tons, of volatile organic compounds for each calendar month and each 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep the records using stack test data when available, mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(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 8-1

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
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

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

C. EMISSION UNIT 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
EUPRIMEROBOT1	An automatic spray booth used to apply prime/adhesion prime coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUPRIMEROBOT2	An automatic spray booth used to apply prime/adhesion prime coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUPRIMEMANUAL	A manual spray booth used to apply prime/adhesion prime coatings to plastic parts. Stack ID SV-EASTPRIME.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUBASEROBOT1	An automatic spray booth used to apply base coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUBASEROBOT2	An automatic spray booth used to apply base coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUBASEROBOT3	An automatic spray booth used to apply base coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP

Section 1 – 52nd Street

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBASEROBOT4	An automatic spray booth used to apply base coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUBASEMANUAL	A manual spray booth used to apply base coatings to plastic parts. Stack ID SV-EASTBASE.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARROBOT1	An automatic spray booth used to apply clear coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARROBOT2	An automatic spray booth used to apply clear coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARROBOT3	An automatic spray booth used to apply clear coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARROBOT4	An automatic spray booth used to apply clear coatings to plastic parts. Emissions from the booth are controlled by a common regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN5.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUCLEARMANUAL	A manual spray booth used to apply clear coatings to plastic parts. Stack ID SV-EASTCLEAR.	05/04/1994/ 04/02/2002	FGEASTPAINT FGSUBPARTPPPP
EUOVEN	A natural gas-fired cure oven. Stack ID SV-EASTBASECLROVEN.	05/04/1994/ 04/02/2002	FGEASTPAINT
EUEASTSAMPLEBOOTH1	One automatic dry filter sample booth which is used on a limited basis to test coatings on parts. Stack ID SV-SAMPLE-BOOTH1.	05/04/1994	FGRULE287(2)(c) FGSUBPARTPPPP
EUEASTSAMPLEBOOTH2	One manual dry filter sample booth which is used on a limited basis to test coatings on parts. Stack ID SV-SAMPLE-BOOTH2.	04/02/2002	FGRULE287(2)(c) FGSUBPARTPPPP

Section 1 – 52nd Street

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWASTESOLVRC	This unit is located at the Paint East facility and consists of a waste solvent distillation unit used for onsite recycling of purge and cleanup solvents.	12/13/1993	FGRULE290 FGSUBPARTPPPP
EUWESTROBOT1	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT2	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT3	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT4	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT5	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT6	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWESTROBOT7	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer. Particulate is controlled by a dry mat filter or equivalent technology.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT8	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOOVEN	This group consists of one dry off oven. Stack ID SV-OVENWRESIST.	07/07/1994/ 12/09/2010	FGWESTROBOPAINT
EUWESTMANUAL1	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM1.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL2	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM2.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL3	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM3.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL4	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM4.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL5	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM5.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL6	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM6.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL7	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM7.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP

Section 1 – 52nd Street

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWESTMANUAL8	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM8.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL9	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM9.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL10	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM10.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANOVEN	This unit consists for one paint dry oven for the manual spray booths. Stack ID SV-WTOPCOATOVE.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTSTRIPTANK	This unit consists of one strip tank for masks.	07/07/1994/ 12/09/2010	FGWESTMISPAINT FGSUBPARTPPPP
EUWESTPAINTKITCHEN	This emission unit is the paint mixing room. Stack ID SV-WESTPAINTKITCHEN.	07/07/1994/ 12/09/2010	FGWESTMISPAINT FGSUBPARTPPPP
EUSPINELLE	Pretreatment system for washing parts prior to coating: including a series of spray cleaning and wash stages, as well as an anodic etch dip tank. The anodic etch dip tank will be exhausted to a chrome composite mesh pad system.	11/4/2019	FGCENTRALPAINT
EUCENTRALPAINT	Exterior plastic automotive parts automatic paint system including a primer booth, a basecoat booth, a clearcoat booth, and one natural gas fired curing oven (indirect fired oven). VOC Emissions from each booth and an oven are captured by using a Permanent Total Enclosure (PTE) and abated via a Regenerative Thermal Oxidizer (RTO). Each paint booth is equipped with a water curtain system to control particulate matter.	11/4/2019	FGCENTRALPAINT, FGSUBPARTPPPP, FGSUBPARTDDDDD
EUSOLRECLAIM	Solvent reclamation system (90% by weight).	9/1/2021	FGCENTRALPAINT
EUEASTPOWERWASH	One 6.5 mmBtu/hr natural gas fueled process heater.	05/04/1994	FGPROCESSHEATERS

Section 1 – 52nd Street

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSPINELLEHEATER1	One 5.3 mmBtu/hr natural gas fueled process heater.	03/22/2005	FGPROCESSHEATERS
EUSPINELLEHEATER2	One 2.0 mmBtu/hr natural gas fueled process heater.	03/22/2005	FGPROCESSHEATERS
EUWESTMASKWASH1	One 0.75 mmBtu/hr natural gas fueled process heater.	07/07/1994	FGPROCESSHEATERS
EUWESTMASKWASH2	One 0.75 mmBtu/hr natural gas fueled process heater.	07/07/1994	FGPROCESSHEATERS
EUPSVGENSET	One 40 BHP, natural gas fueled, 4 stroke rich burn, spark ignition internal combustion engine designed to provide 20kW of electrical power. Located at the Protective Services Building.	05/22/2014	FGNSPSJJJJ
EUWESTASSEMBLY	Assembly station which uses a silicone and “Super Glue” type adhesive to assemble plastic component parts. The 52nd Street - West facility has (3) assembly work stations using adhesives. Stack ID SV-MANBOOTH-MA1.	NA	FGRULE287(2)(c)
EUASSEMBLYOPS	Assembly stations that use adhesive and foam to assemble plastic component parts. The operation consists of seventeen (17) individual workstations located in the Assembly Facility on Barden Drive.	NA	FGRULE290
EUMAINTCLEANER	Small, cold solvent cleaner units used in the maintenance departments to clean machine parts being repaired.	NA	FGCOLDCLEANER

EUPRIMEMANUAL
EMISSION UNIT CONDITIONS

DESCRIPTION

A manual spray booth used to apply prime/adhesion prime coatings to plastic parts.

Flexible Group ID: FGEASTPAINT, FGSUBPARTPPPP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	45.0 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUPRIMEMANUAL	SC VI.3, VI.4	**R 336.1702(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA.	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data.[2] **(R 336.1225, R 336.1702, R 336.1901)**

VI. MONITORING/RECORDKEEPING

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

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar 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)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and solvent, 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.[2] **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

3. The permittee shall keep the following information on a monthly basis for EUPRIMEMANUAL:

   a. Gallons (with water) of each coating, reducer, and solvent used.
   b. VOC content (minus water and with water) of each coating 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.
   e. Hours of operation.

   The records shall be kept in the format specified in Appendix 4-1.A and 4-1.B or an alternate format that has been approved by the AQD District Supervisor.[2] **(R 336.1225, R 336.1702, R 336.1901)**

4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EUPRIMEMANUAL:

   a. Gallons of each solvent used and reclaimed.
   b. VOC content, in pounds per gallon, of each solvent used.
   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 records shall be kept in the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.[2] **(R 336.1225, R 336.1702, R 336.1901)**

See Appendix 4-1

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 8-1

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-EASTPRIME	52[2]	80.0[2]	**R 336.1702(a)**

IX. OTHER REQUIREMENT(S)

NA

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

EUBASEMANUAL
EMISSION UNIT CONDITIONS

DESCRIPTION

A manual spray booth used to apply base coatings to plastic parts.

Flexible Group ID: FGEASTPAINT, FGSUBPARTPPPP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	60.0 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUBASEMANUAL	SC VI.3, VI.4	**R 336.1702(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data.[2] **(R 336.1225, R 336.1702, R 336.1901)**

VI. MONITORING/RECORDKEEPING

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

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar 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)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and solvent, 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.[2] **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

3. The permittee shall keep the following information on a monthly basis for EUBASEMANUAL:

   a. Gallons (with water) of each coating, reducer, and solvent used.
   b. VOC content (minus water and with water) of each coating 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.
   e. Hours of operation.

   The records shall be kept in the format specified in Appendix 4-1.A and 1-4.B or an alternate format that has been approved by the AQD District Supervisor.[2] **(R 336.1225, R 336.1702, R 336.1901)**

4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EUBASEMANUAL:

   a. Gallons of each solvent used and reclaimed.
   b. VOC content, in pounds per gallon, of each solvent used.
   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 records shall be kept in the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.[2] **(R 336.1225, R 336.1702, R 336.1901)**

See Appendix 4-1

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 8-1

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-EASTBASE	52[2]	80.0[2]	**R 336.1702(a)**

IX. OTHER REQUIREMENT(S)

NA

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

EUCLEARMANUAL
EMISSION UNIT CONDITIONS

DESCRIPTION

A manual spray booth used to apply clear coatings to plastic parts.

Flexible Group ID: FGEASTPAINT, FGSUBPARTPPPP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	30.0 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUCLEARMANUAL	SC VI.3, VI.4	**R 336.1702(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA.	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data.[2] **(R 336.1225, R 336.1702, R 336.1901)**

VI. MONITORING/RECORDKEEPING

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

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar 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)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and solvent, 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.[2] **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

3. The permittee shall keep the following information on a monthly basis for EUCLEARMANUAL:

   a. Gallons (with water) of each coating, reducer, and solvent used.
   b. VOC content (minus water and with water) of each coating 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.
   e. Hours of operation.

   The records shall be kept in the format specified in Appendix 4-1.A and 1-4.B or an alternate format that has been approved by the AQD District Supervisor.[2] **(R 336.1225, R 336.1702, R 336.1901)**

4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EUCLEARMANUAL:

   a. Gallons of each solvent used and reclaimed.
   b. VOC content, in pounds per gallon, of each solvent used.
   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 records shall be kept in the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.[2] **(R 336.1225, R 336.1702, R 336.1901)**

See Appendix 4-1

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 8-1

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-EASTCLEAR	52[2]	80.0[2]	**R 336.1702(a)**

IX. OTHER REQUIREMENT(S)

NA

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

D. FLEXIBLE GROUP CONDITIONS

Part D outlines 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
FGEASTPAINT	A plastic parts coating line consisting of thirteen spray booths located at 52nd Paint East. The coatings applied on the line are prime/adhesion prime, base, and clear coats. The prime coating portion of the line consists of two robotic booths (EUPRIMEROBOT1 & EUPRIMEROBOT2), one manual booth (EUPRIMEMANUAL), and a flashoff area. The basecoat portion of the line consists of four robotic booths (EUBASEROBOT1, EUBASEROBOT2, EUBASEROBOT3, & EUBASEROBOT4), one manual booth (EUBASEMANUAL), and a flashoff area. The clearcoat portion of the line consists of four robotic booths (EUCLEARROBOT1, EUCLEARROBOT2, EUCLEARROBOT3, & EUCLEARROBOT4), one manual booth (EUCLEARMANUAL), a flashoff area, and a natural gas-fired cure oven (EUOVEN). Emissions from all of the robotic booths are captured and controlled by a regenerative thermal oxidizer (RTO). Emissions from each of the manual booths and the oven are directly vented to the outside atmosphere. All booths use down-draft waterwash particulate control.	EUPRIMEROBOT1 EUPRIMEROBOT2 EUPRIMEMANUAL EUBASEROBOT1 EUBASEROBOT2 EUBASEROBOT3 EUBASEROBOT4 EUBASEMANUAL EUCLEARROBOT1 EUCLEARROBOT2 EUCLEARROBOT3 EUCLEARROBOT4 EUCLEARMANUAL EUOVEN
FGWESTROBOPAINT	This flexible group consists of 8 robot spray booths and 1 dry oven located at the 52nd Paint West facility. The spray emissions are captured and controlled by a single RTO. The booths use dry filters to remove paint overspray.	EUWESTROBOT1 EUWESTROBOT2 EUWESTROBOT3 EUWESTROBOT4 EUWESTROBOT5 EUWESTROBOT6 EUWESTROBOT7 EUWESTROBOT8 EUWESTROBOOVEN

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGWESTMANUAL	This group consists of 10 hand spray booths and one paint dry oven located at the 52nd Paint West facility.	EUWESTMANUAL1 EUWESTMANUAL2 EUWESTMANUAL3 EUWESTMANUAL4 EUWESTMANUAL5 EUWESTMANUAL6 EUWESTMANUAL7 EUWESTMANUAL8 EUWESTMANUAL9 EUWESTMANUAL10 EUWESTMANOVEN
FGWESTMISPAINT	The group consists of miscellaneous solvent usage at the 52nd Paint West Facility.	EUWESTSTRIPTANK EUWESTPAINTKITCHEN
FGCENTRALPAINT	Pretreatment system, exterior plastic automotive parts automatic paint system, and solvent reclamation system. VOC emission from EUCENTRALPAINT are captured by using a Permanent Total Enclosure (PTE) and abated via a Regenerative Thermal Oxidizer (RTO). Each paint booth of EUCENTRALPAINT is equipped with a water curtain system to control particulate matter. EUSPINELLE is controlled by a composite mesh pad system.	EUSPINELLE, EUCENTRALPAINT, EUSOLRECLAIM

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGSUBPARTPPPP	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). This includes equipment covered by other permits, grandfathered equipment, and exempt equipment. 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.	EUPRIMEROBOT1 EUPRIMEROBOT2 EUPRIMEMANUAL EUBASEROBOT1 EUBASEROBOT2 EUBASEROBOT3 EUBASEROBOT4 EUBASEMANUAL EUCLEARROBOT1 EUCLEARROBOT2 EUCLEARROBOT3 EUCLEARROBOT4 EUCLEARMANUAL EUEASTSAMPLEBOOTH1 EUEASTSAMPLEBOOTH2 EUWASTESOLVRC EUWESTROBOT1 EUWESTROBOT2 EUWESTROBOT3 EUWESTROBOT4 EUWESTROBOT5 EUWESTROBOT6 EUWESTROBOT7 EUWESTROBOT8 EUWESTMANUAL1 EUWESTMANUAL2 EUWESTMANUAL3 EUWESTMANUAL4 EUWESTMANUAL5 EUWESTMANUAL6 EUWESTMANUAL7 EUWESTMANUAL8 EUWESTMANUAL9 EUWESTMANUAL10
FGSUBPARTPPPP (cont.)	(cont.)	EUWESTMANOVEN EUWESTSTRIPTANK EUWESTPAINTKITCHEN
FGPROCESSHEATERS	This group consists of 5 existing natural gas fueled process heaters with capacities of 6.5, 5.3, 2.0, 0.75 and 0.75 mmBtu/hr respectively.	EUEASTPOWERWASH, EUSPINELLEHEATER1, EUSPINELLEHEATER2, EUWESTMASKWASH1, EUWESTMASKWASH2

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGNSPSJJJJ	Requirements for any new spark ignition emergency engine that commenced construction after June 12, 2006 and was manufactured on or after January 1, 2009 at major sources of Hazardous Air Pollutants per 40 CFR Part 60 Subpart JJJJ	EUPSVGENSET
FGRULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a and 287(2)(c).	EUWESTASSEMBLY EUEASTSAMPLEBOOTH1 EUEASTSAMPLEBOOTH2
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	EUWASTESOLVRC, EUASSEMBLYOPS
FGCOLDCLEANER	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.	EUMAINTCLEANER

FGEASTPAINT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

A plastic parts coating line consisting of thirteen spray booths. The coatings applied on the line are prime/adhesion prime, base, and clear coats. The prime coating portion of the line consists of two robotic booths (EUPRIMEROBOT1 & EUPRIMEROBOT2), one manual booth (EUPRIMEMANUAL), and a flashoff area. The basecoat portion of the line consists of four robotic booths (EUBASEROBOT1, EUBASEROBOT2, EUBASEROBOT3, & EUBASEROBOT4), one manual booth (EUBASEMANUAL), and a flashoff area. The clearcoat portion of the line consists of four robotic booths (EUCLEARROBOT1, EUCLEARROBOT2, EUCLEARROBOT3, & EUCLEARROBOT4), one manual booth (EUCLEARMANUAL), a flashoff area, and a natural gas-fired cure oven (EUOVEN). Emissions from all of the robotic booths are captured and controlled by a regenerative thermal oxidizer (RTO). Emissions from each of the manual booths and the oven are directly vented to the outside atmosphere. All booths use down-draft water wash particulate control. Compliance Assurance Monitoring applies to this flexible group.

Emission Units: EUPRIMEROBOT1, EUPRIMEROBOT2, EUPRIMEMANUAL, EUBASEROBOT1, EUBASEROBOT2, EUBASEROBOT3, EUBASEROBOT4, EUBASEMANUAL, EUCLEARROBOT1, EUCLEARROBOT2, EUCLEARROBOT3, EUCLEARROBOT4, EUCLEARMANUAL, EUOVEN

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer, Water Wash Particulate Control

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	45.0 pounds per hour[1]	Hourly	FGEASTPAINT	SC V.1	**R 336.1225**
2. VOC	11.1 tons per month[2, 3]	As determined at the end of each calendar month.	FGEASTPAINT	SC VI.9, VI.11	**R 336.1220 R 336.1702(a)**
3. VOC	111.61 tons per year[2, 3]	365-day rolling time period as determined at the end of each calendar day	FGEASTPAINT	SC VI.8, VI.10	**R 336.1205 R 336.1220 R 336.1702(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA.	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All waste coatings, reducers, and solvents shall be captured and stored in closed containers and shall be disposed of in an acceptable manner in compliance with all applicable rules and regulations.[2] **(R 336.1224, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any spray booth portion of FGEASTPAINT unless its respective waterwash particulate control is installed and operating in a satisfactory manner.[2] **(R 336.1224, R 336.1901, R 336.1910)**

2. The permittee shall not operate any robotic spray booth portion of FGEASTPAINT unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC capture efficiency of 100 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of 1400 °F and a minimum retention time of 0.5 seconds.[2,3] **(R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.1910)**

3. The permittee shall equip and maintain all basecoat and clearcoat spray booth portions of FGEASTPAINT with electrostatic applicators or equivalent technology with comparable transfer efficiency.[2,3] **(R 336.1220, R 336.1702)**

4. The permittee shall equip and maintain all electrostatic applicator portions of FGEASTPAINT with a device to prevent electric current from being shut off except by authorized personnel.[2,3] **(R 336.1220, R 336.1702)**

V. TESTING/SAMPLING

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

1. Within five years from issuance of this ROP, the permittee shall verify the destruction efficiency of the regenerative thermal oxidizer, by testing at owner's expense, in accordance with Department requirements. **(R 336.1213(3), 40 CFR 64.6(d))**

2. Within 180 days of ROP issuance and annually thereafter, the permittee shall verify that the direction of air flow at each natural draft opening (NDO) on each robotic booth portion of FGEASTPAINT is into the booth. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. All test methods, plans, and procedures shall be approved by the AQD prior to testing.[2,3] **(R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.1910, 40 CFR 64.6(d))**

3. The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received may be determined from manufacturer's formulation data.[2] **(R 336.1225, R 336.1702, R 336.1901)**

4. Within one year of ROP issuance and annually thereafter, the permittee shall verify the VOC content of the five most frequently used coatings, plus 2% of the remaining coatings, as received and as applied using federal reference Method 24. The five most frequently used coatings shall be determined based on the previous 12 months from the date of sampling. If at any time, the Method 24 and the manufacturer's formulation values should differ, the highest of the two values shall be used to calculate emissions. **(R 336.1213(3))**

See Appendix 5-1

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 monitor, in a satisfactory manner, the temperature in the thermal oxidizer combustion zone on a continuous basis using a thermocouple and paper chart recorder or in a manner and with instrumentation acceptable to the AQD.[2,3] **(R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 64.6(c)(1))**

2. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer combustion zone.[2,3] **(R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 64.6(b))**

3. An excursion occurs under the following circumstances: **(40 CFR 64.6(c)(2))**

   a. The RTO combustion chamber temperature is operated below 1400 °F.
   b. The RTO does not meet the permitted destruction efficiency of 95% by weight.
   c. The direction of air flow at any natural draft opening (NDO) of a robotic booth is flowing out of the robotic booth rather than into the booth.

4. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of FGEASTPAINT (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). An interlock system shuts down the robotic spray booths if the temperature of the RTO drops below 1400 °F. **(40 CFR 64.7(d))**

5. The permittee shall conduct continuous temperature monitoring while the equipment is operating. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emission unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

5. The temperature system of the RTO shall be validated and calibrated on an annual basis by a third party auditor. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

6. At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down the robotic spray booth portion of FGEASTPAINT when the temperature of the thermal oxidizer drops below the minimum temperature requirement. Verification of the interlock system's operational integrity shall be conducted using methods, plans and procedures approved by the AQD prior to testing. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. **(R 336.1213(3), 40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

7. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

8. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and solvent, 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.[2, 3] **(R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901)**

9. The permittee shall keep the following information on a daily basis for FGEASTPAINT:

   a. Gallons (with water) of each coating, reducer, and solvent used.
   b. VOC content (minus water and with water) of each coating as applied.
   c. VOC mass emission calculations determining the annual emission rate in tons per 365-day rolling time period as determined at the end of each calendar day.

   The records shall be kept in the format specified in Appendix 4-1.A and 1-4.B or an alternate format that has been approved by the AQD District Supervisor.[2, 3] **(R 336.1220, R 336.1225, R 336.1702, R 336.1901)**

10. The permittee shall keep the following information on a monthly basis for FGEASTPAINT:

    a. Gallons (with water) of each coating, reducer, and solvent used.
    b. VOC content (minus water and with water) of each coating as applied.
    c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
    d. Hours of operation.

    The records shall be kept in the format specified in Appendix 4-1.A and 1-4.B or an alternate format that has been approved by the AQD District Supervisor.[2, 3] **(R 336.1220, R 336.1225, R 336.1702, R 336.1901)**

11. The permittee shall keep the following information on a daily basis for the use of purge and clean-up solvents associated with FGEASTPAINT:

    a. Gallons of each solvent used and reclaimed.
    b. VOC content, in pounds per gallon, of each solvent used.
    c. VOC mass emission calculations determining the annual emission rate in tons per 365-day rolling time period as determined at the end of each calendar day.

    The records shall be kept in the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.[2, 3] **(R 336.1220, R 336.1225, R 336.1702, R 336.1901)**

12. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with FGEASTPAINT:

    a. Gallons of each solvent used and reclaimed.
    b. VOC content, in pounds per gallon, of each solvent used.
    c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.

    The records shall be kept in the format specified in Appendix 4-1.C or an alternate format that has been approved by the AQD District Supervisor.[2, 3] **(R 336.1220, R 336.1225, R 336.1702, R 336.1901)**

13. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar 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)**

14. On an annual basis, the permittee shall inspect and document the internal and external structural integrity of the regenerative thermal oxidizer to ensure proper operation as documented in the Operation and Maintenance Plan. **(40 CFR 64.6(c))**

15. The permittee shall comply with all elements of the approved Compliance Assurance Monitoring Plan. **(40 CFR 64.9)**

See Appendix 4-1

VII. REPORTING

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

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. **(R 336.12001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5))**

7. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**

8. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8-1

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-EASTPRIME	52[2]	80.0[2]	**R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)**
2. SV-EASTBASE	52[2]	80.0[2]	**R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)**
3. SV-EASTCLEAR	52[2]	80.0[2]	**R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)**
4. SV-REGENINCIN5	48[2]	45.0[2]	**R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)**
5. SV-EASTBASECLROVEN	36[2]	45.0[2]	**R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

1. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

2. The permittee shall, at all times, maintain the monitoring system, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**

3. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

4. The permittee shall maintain and operate FGEASTPAINT according to the procedures outlined in the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor. See Appendix 9-1.[2] **(R 336.1910)**

See Appendix 9-1

Footnotes:

[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).
[3]This condition was established pursuant to Rule 220 as it applied at the time of permitting in 2005. This limit was established under Non-attainment New Source Review which required LAER and emission offsets for VOC's. Rule 220 has been rescinded, and the current equivalent rule is R 336.1908.

FGWESTROBOPAINT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This group consists of eight (8) coating spray booths used to coat plastic parts and one (1) oven located at the 52nd Paint West facility. Compliance Assurance Monitoring applies to this flexible group.

Emission Units: EUWESTROBOT1, EUWESTROBOT2, EUWESTROBOT3, EUWESTROBOT4, EUWESTROBOT5, EUWESTROBOT6, EUWESTROBOT7, EUWESTROBOT8, EUWESTROBOOVEN

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer, Dry Mat Filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	80 pounds per day[2]	Based upon a 24-hour averaging period as determined at the end of each 24-hour production day.	FGWESTROBOPAINT	SC VI.1	**R 336.1702(a) R 336.2810 40 CFR 52.21**
2. VOC	1.0 tons per month[2]	As determined at the end of each calendar month.	FGWESTROBOPAINT	SC VI.1	**R 336.1702(a) R 336.2810 40 CFR 52.21**
3. VOC	11.7 tons per year[2]	12-month rolling time period as determined at the end of each calendar month	FGWESTROBOPAINT	SC VI.1	**R 336.1702(a) R 336.2810 40 CFR 52.21**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall equip and maintain all paint spray booths with High Volume Low Pressure spray guns or equivalent technology with comparable transfer efficiency.[2] **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

2. The permittee shall not operate any of the eight automatic spray booths unless the dry filters are installed and operating properly.[2] **(R 336.1224, R 336.1901, R 336.1910)**

3. The permittee shall not operate any of the eight automatic spray booths unless the thermal incinerator is installed and operating properly. Proper operation of the thermal incinerator includes a minimum VOC destruction efficiency of 95% (by weight) and maintaining a minimum operating temperature of 1400 ˚F and a minimum retention time of 0.5 seconds.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

4. All waste paints, reducers, catalysts, purge solvents, and cleanup solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner which minimizes the introduction of air contaminants to the outer air.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

5. The permittee shall recover and reclaim, recycle or dispose of, in accordance with applicable regulations, a minimum of 90% by weight of all purge and cleanup solvents.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Within five years from issuance of this ROP verification of the destruction efficiency of the regenerative thermal oxidizer, by testing at owner's expense, in accordance with Department requirements, will be required.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(d))**

2. Verification that the direction of air flow at each natural draft opening (NDO) on each robotic booth in FGWESTROBOPAINT is into the booth, by testing at owner's expense, in accordance with Department requirements, will be required on a semiannual basis. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. The permittee shall submit a notice of the anticipated test date to the AQD District Supervisor no later than two weeks prior to the test date. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 30 days following the last date of the test. After two consecutive tests demonstrating that the direction of air flow at all NDOs is into the booths, the permittee may request that the monitoring schedule be revised to a less frequent time period as approved by the AQD District Supervisor.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(d))**

3. At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down the robotic spray booth portion of FGWESTROBOPAINT when the temperature of the thermal oxidizer drops below the minimum temperature requirement. Verification of the interlock system's operational integrity shall be conducted using methods, plans and procedures approved by the AQD prior to testing. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. **(R 336.1213(3), 40 CFR 64.6(c)(3), 40 CFR 64.7(d))**

~~4.~~ The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received may be determined from manufacturer's formulation data.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)**

5. Within one year of ROP issuance and annually thereafter, the permittee shall verify the VOC content of the three most frequently used coatings as received and as applied using federal reference Method 24. The three most frequently used coatings shall be determined based on the previous 12 months from the date of sampling. 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, R 336.2810, 40 CFR 52.21)**

See Appendix 5-1

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 the following records:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   a. Monthly records for each coating sprayed:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**
      i. The amount in gallons of coating applied.
      ii. The VOC content in pounds per gallon of coating (minus water) as received and as applied.
      iii. The VOC content in pounds per gallon of reducers and catalysts and the amounts in gallons applied.

   b. Monthly records for each purge and cleaning solvent used:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**
      i. The amount in gallons of solvent used.
      ii. The amount in gallons of solvent reclaimed.
      iii. The percentage (by weight) of solvents reclaimed.
      iv. The VOC content in pounds per gallon of coating as used.

   c. VOC emission calculations determining the VOC mass emissions for each calendar month in tons per month and a 12-month rolling time period average mass emission at the end of each calendar month in tons per year.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   d. VOC emission calculations determining the VOC emission rate in pounds per day based upon a 24-hour averaging period and determined at the end of each 24-hour production day.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

2. An excursion occurs under the following circumstances:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(c)(2))**

   a. The RTO combustion chamber temperature is operated below 1400 °F.
   b. The RTO does not meet the permitted destruction efficiency of 95% by weight.
   c. The direction of air flow at any natural draft opening (NDO) of a robotic booth is flowing out of the robotic booth rather than into the booth.

3. The permittee shall restore operation of FGWESTROBOPAINT including the control device and capture system to normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). An interlock system shuts down the robotic spray booths if the temperature of the RTO drops below 1400 °F.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.7(d))**

4. The permittee shall monitor, in a satisfactory manner, the temperature in the thermal oxidizer combustion zone on a continuous basis using a thermocouple and paper chart recorder or in a manner and with instrumentation acceptable to the AQD.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(c)(1))**

5. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer combustion zone.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21, 40 CFR 64.6(b))**

6. The temperature system of the RTO shall be validated and calibrated on an annual basis by a third party auditor. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

7. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained under 40 CFR Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). **(40 CFR 64.9(b))**

8. On an annual basis, the permittee shall inspect and document the internal and external structural integrity of the regenerative thermal oxidizer to ensure proper operation as documented in the Operation and Maintenance Plan. **(40 CFR 64.6(c))**

9. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emission unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

10. The permittee shall comply with all elements of the approved Compliance Assurance Monitoring Plan. **(40 CFR 64.9)**

VII. REPORTING

1. Prompt reporting of deviations, including exceedances and excursions pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii), 40 CFR 64.9)**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be postmarked or received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.[2] **(R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.[2] **(R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.[2] **(R 336.2001(5))**

7. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**

8. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8-1

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-REGENINCIN	42[2]	51[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
2. SV-OVENWRESIST	14[2]	51[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

2. The permittee shall, at all times, maintain the monitoring system, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**

3. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation at all times that the pollutant-specific emissions unit operating. **(40 CFR 64.7(c))**

4. The permittee shall comply with all requirements of 40 CFR Part 64. **(40 CFR Part 64)**

5. The permittee shall maintain and operate FGWESTROBOPAINT according to the procedures outlined in the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor. See Appendix 9-1. **(R 336.1213(3))**

See Appendix 9-1

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

FGWESTMANUAL
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The group consists of (10) manual spray coat booths used to coat plastic parts and one (1) oven located at Lacks 52nd Paint West Paint facility.

Emission Units: EUWESTMANUAL1, EUWESTMANUAL2, EUWESTMANUAL3, EUWESTMANUAL4, EUWESTMANUAL5, EUWESTMANUAL6, EUWESTMANUAL7, EUWESTMANUAL8, EUWESTMANUAL9, EUWESTMANUAL10, EUWESTMANOVEN

POLLUTION CONTROL EQUIPMENT

Dry Mat Filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	460 pounds per day[2]	Based upon a 24-hour averaging period as determined at the end of each 24-hour production day.	FGWESTMANUAL	SC VI.1	**R 336.1702(a)** **R 336.2810** **40 CFR 52.21**
2. VOC	5.8 tons per month[2]	As determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	**R 336.1702(a)** **R 336.2810** **40 CFR 52.21**
3. VOC	70.0 tons per year[2]	12-month rolling time period as determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	**R 336.1702(a)** **R 336.2810** **40 CFR 52.21**
4. VOC Red and black air-dried coatings	5.75 pounds per gallon of coating, minus water, as applied[2]	Based upon a calendar day averaging time period as determined at the end of each calendar day.	FGWESTMANUAL	SC VI.1	**R 336.1702(a)** **R 336.2810** **40 CFR 52.21**
5. VOC Non-red and black air-dried coatings	5.0 pounds per gallon of coating, minus water, as applied[2]	Based upon a calendar day averaging time period as determined at the end of each calendar day.	FGWESTMANUAL	SC VI.1	**R 336.1702(a)** **R 336.2810** **40 CFR 52.21**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Exotic colored coatings	A maximum of 10%, by volume, of all coatings applied.[2]	Based upon a 12-month rolling time period as determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	**R 336.1702(a) R 336.2810 40 CFR 52.21**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall equip and maintain all paint spray booths with High Volume Low Pressure spray guns or equivalent technology with comparable transfer efficiency.[2] **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

2. The permittee may use conventional air atomized spray guns in the spray coat booths for the application of exotic colors only.[2] **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

3. The permittee shall not operate any of the ten manual spray booths unless the dry filters are installed and operating properly.[2] **(R 336.1224, R 336.1901, R 336.1910)**

4. The permittee shall dispose of spent filters in a manner that minimizes the introduction of air contaminants to the outer air.[2] **(R 336.1224, R 336.1901, R 336.1910)**

5. The permittee shall not operate the EUWESTMANOVEN portion of FGWESTMANUAL at a temperature in excess of 194 °F.[2] **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

6. All waste paints, reducers, catalysts, purge solvents, and cleanup solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner which minimizes the introduction of air contaminants to the outer air.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

7. The permittee shall recover and reclaim, recycle or dispose of, in accordance with applicable regulations, a minimum of 90% by weight of all purge and cleanup solvents.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the bake oven temperature on a continuous basis.[2] **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

V. TESTING/SAMPLING

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

1. The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received may be determined from manufacturer's formulation data.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)**

2. Within one year of ROP issuance and annually thereafter, the permittee shall verify the VOC content of the five most frequently used coatings, plus 2% of the remaining coatings, as received and as applied using federal reference Method 24. The five most frequently used coatings shall be determined based on the previous 12 months from the date of sampling. If at any time, the Method 24 and the manufacturer's formulation values should differ, the highest of the two values shall be used to calculate emissions.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)**

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:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   a. Monthly records for each coating sprayed:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**
      i. The coating identification/coating category (e.g. air-dried red/black coating, air-dried non red/black coating or exotic colors) for each coating used.
      ii. The amount in gallons of coating applied.
      iii. The VOC content in pounds per gallon of coating, minus water, as received and as applied based upon a 24- hour averaging period and determined at the end of each 24-hour production day.
      iv. The VOC content in pounds per gallon of reducers and catalysts and the amounts in gallons applied based upon a 24- hour averaging period and determined at the end of each 24-hour production day.

   b. Monthly records for each purge and cleaning solvent used:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**
      i. The amount in gallons of solvent used.
      ii. The amount in gallons of solvent reclaimed.
      iii. The percentage (by weight) of solvents reclaimed.
      iv. The VOC content in pounds per gallon of coating as used.

   c. Average VOC emission calculations determining the uncontrolled pounds per gallon of coating, minus water, as applied for air-dried red/black coatings and air-dried non red/black coatings each calendar day.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   d. VOC emission calculations determining the VOC mass emissions for each calendar month in tons per month and a 12-month rolling time period average mass emission at the end of each calendar month in tons per year.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   e. VOC emission calculations determining the VOC emission rate in pounds per day based upon a 24-hour averaging period and determined at the end of each 24-hour production day.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   f. Calculations determining the percentage of exotic coatings used for each calendar month and a 12-month rolling time period as determined at the end of each calendar month.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

2. The permittee shall monitor and record the bake oven temperature on a continuous basis.[2] **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

3. The permittee shall keep, in a satisfactory manner, continuous records of the bake temperature as required by SC VI.2.[2] **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

See Appendix 4-1

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 8-1

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-MANBOOTHM1	24^2	51^2	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
2. SV-MANBOOTHM2	24^2	51^2	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
3. SV-MANBOOTHM3	24^2	51^2	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
4. SV-MANBOOTHM4	24^2	51^2	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
5. SV-MANBOOTHM5	24^2	51^2	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
6. SV-MANBOOTHM6	24^2	51^2	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
7. SV-MANBOOTHM7	24[2]	51[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
8. SV-MANBOOTHM8	24[2]	51[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
9. SV-MANBOOTHM9	24[2]	51[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
10. SV-MANBOOTHM10	24[2]	51[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
11. SV-WTOPCOATOVE	16[2]	51[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain and operate FGWESTMANUAL according to the procedures outlined in the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor. See Appendix 9-1. **(R 336.1213(3))**

See Appendix 9-1

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

FGWESTMISPAINT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The group consists of miscellaneous solvent usage at the 52nd Paint West Facility.

Emission Units: EUWESTSTRIPTANK, EUWESTPAINTKITCHEN

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC – strip tank operations	1.4 lbs/hr[2]	24-hour averaging period as determined at the end of each 24-hour production day	EUWESTSTRIPTANK	SC VI.1	**R 336.1702(a) R 336.2810 40 CFR 52.21**
2. VOC – strip tank operations	2.0 tons/year[2]	12-month rolling time period as determined at the end of each calendar month	EUWESTSTRIPTANK	SC VI.1	**R 336.1702(a) R 336.2810 40 CFR 52.21**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall equip and maintain both the strip tank with a cover. The cover shall be closed whenever the individual unit is not in use.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

2. All waste paints and stripping solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner which minimizes the introduction of air contaminants to the outer air.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

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 VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received shall be determined using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, then the Method 24 results shall be used to determine compliance. **(R 336.1213(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 maintain records of the following for EUWESTSTRIPTANK:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   a. Monthly records for each stripping solvent used:[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**
      i. The amount in gallons used.
      ii. The amount in gallons reclaimed.
      iii. The VOC content in pounds per gallon of solvent as used.

   b. VOC emission calculations determining the VOC mass emissions for each calendar month in tons per month and a 12-month rolling time period average mass emission at the end of each calendar month in tons per year.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   c. VOC emission calculations determining the VOC emission rate in pounds per day based upon a 24- hour averaging period and determined at the end of each 24-hour production day.[2] **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

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 8-1

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-WESTSTRIPTANKRM	13[2]	34[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**
2. SV-WESTPAINTKITCHEN	37[2]	34[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

NA

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

FGSUBPARTPPPP
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units: EUPRIMEROBOT1, EUPRIMEROBOT2, EUPRIMEMANUAL, EUBASEROBOT1, EUBASEROBOT2, EUBASEROBOT3, EUBASEROBOT4, EUBASEMANUAL, EUCLEARROBOT1, EUCLEARROBOT2, EUCLEARROBOT3, EUCLEARROBOT4, EUCLEARMANUAL, EUEASTSAMPLEBOOTH1, EUEASTSAMPLEBOOTH2, EUWASTESOLVRC, EUWESTROBOT1, EUWESTROBOT2, EUWESTROBOT3, EUWESTROBOT4, EUWESTROBOT5, EUWESTROBOT6, EUWESTROBOT7, EUWESTROBOT8, EUWESTMANUAL1, EUWESTMANUAL2, EUWESTMANUAL3, EUWESTMANUAL4, EUWESTMANUAL5, EUWESTMANUAL6, EUWESTMANUAL7, EUWESTMANUAL8, EUWESTMANUAL9, EUWESTMANUAL10, EUWESTMANOVEN, EUWESTSTRIPTANK, EUWESTPAINTKITCHEN

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer

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	Existing - General Use Coating	SC V.1, V.2 SC VI.1 through VI.10	**40 CFR 63.4490(b)(1)**
2. Organic HAP	0.26 lb per lb of coating solids	12-month rolling time period as determined at the end of each calendar month	Existing – Thermoplastic Olefin (TPO) Coating	SC V.1, V.2 SC VI.1 through VI.10	**40 CFR 63.4490(b)(3)**

3. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.4490 using at least one of the following three options, which are listed in 40 CFR 63.4491(a) through (c):

   a. Compliant material option,

   b. Emission rate without add-on controls option, or

   c. Emission rate with add-on controls option.

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

4. Any coating operation(s) using the compliant material option 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))**

5. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the applicable emission limits at all times except during periods of startup, shutdown, and malfunction. **(40 CFR 63.4500(a)(2)(i))**

6. 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, VI.2, VI.3, VI.5	**40 CFR 63.4491(a)**
2. Each Cleaning Material	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3, VI.5	**40 CFR 63.4491(a)**
* Determined according to 40 CFR 63.4541(a).					

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart PPPP as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.4567. **(40 CFR 63.4492(b) and Table 1)**

Add-on Control Device	Operating Limit
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.4567(a).
Emission capture system that is a PTE according to 40 CFR 63.4565(a).	a. The direction of the air flow at all times must be into the enclosure; and either b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or c. The pressure drop across the enclosure must be at least 0.007 inch H_2O, as established in Method 204 of Appendix M to 40 CFR 51.
Emission capture system that is not a PTE according to 40 CFR 63.4565(a).	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.4567(f).

2. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The work practice plan shall specifiy practices and procedures to ensure at a minimum the following elements are implemented:

a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers. **(40 CFR 63.4493(b)(1))**

b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized. **(40 CFR 63.4493(b)(2))**

c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials and waste materials must be conveyed from one location to another in closed containers or pipes. **(40 CFR 63.4493(b)(3))**

d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents. **(40 CFR 63.4493(b)(4))**

e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment. **(40 CFR 63.4493(b)(5))**

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g). **(40 CFR 63.4493(c))**

3. If the affected source uses an emission capture system and add-on control device, the permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures. **(40 CFR 63.4500(c))**

4. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.4492 at all times except during periods of startup, shutdown, and malfunction. **(40 CFR 63.4500(a)(2)(ii))**

5. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the work practice standards in 40 CFR 63.4493 at all times. **(40 CFR 63.4500(a)(2)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall not operate FGEASTPAINT and FGWESTROBOPAINT unless the regenerative thermal oxidizers are installed, maintained, and operated in a satisfactory manner. **(40 CFR 63.4492(b))**

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)**

2. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall conduct each performance test required by 40 CFR 63.4560 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.4564(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h). **(40 CFR 63.4564(a))**

3. The permittee shall conduct each performance test of an emissions capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.4565 and 40 CFR 63.4566. **(40 CFR 63.4564(b))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.4531)**

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. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.4530(c)(4)(i) through (v). **(40 CFR 63.4530(c)(4))**

   g. 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))**

   h. 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))**

   i. The mass fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.4530(f))**

   j. 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))**

   k. The date, time, and duration of each deviation. **(40 CFR 63.4530(h))**

   l. For the emission rate with add-on controls option, records specified in 40 CFR 63.4530(i)(1) through (8). **(40 CFR 63.4530(i))**

4. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 to 40 CFR Part 63, Subpart PPPP using the applicable method(s) described below: **(40 CFR 63.4563(c))**

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.4567(a).	i. Collect the combustion temperature data according to 40 CFR 63.4568(c); ii. Reduce the data to 3-hour block averages; and ii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
Emission capture system that is a PTE according to 40 CFR 63.4565(a).	a. The direction of the air flow at all times must be into the enclosure; and either b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or c. The pressure drop across the enclosure must be at least 0.007 inch H_2O, as established in Method 204 of Appendix M to 40 CFR Part 51.	i. Collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.4568(g)(1) or the pressure drop across the enclosure according to 40 CFR 63.4568(g)(2); and ii. Maintain the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintain the direction of air flow into the enclosure at all times.
Emission capture system that is <u>not</u> a PTE according to 40 CFR 63.4565(a).	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.4567(f).	i. Collect the gas volumetric flow rate or duct static pressure for each capture device according to 40 CFR 63.4568(g); ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limit.

5. 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)**

6. 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)**

7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit, for each compliance period according to the procedures in 40 CFR 63.4561. **(40 CFR 63.4563)**

8. During the performance test required by 40 CFR 63.4560, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.4567 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.4492. **(40 CFR 63.4567)**

9. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.4568(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.4568(b). **(40 CFR 63.4568)**

10. The permittee must apply to the USEPA for approval of alternative monitoring under 40 CFR 63.8(f), if using an add-on control device other than those listed in Table 1 of 40 CFR Part 63, Subpart PPPP, or to monitor an alternative parameter and comply with a different operating limit. **(40 CFR 63.4492(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))**

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. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(7):

   a. The organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490; **(40 CFR 63.4563(b))**

   b. An operating parameter is out of the allowed range; **(40 CFR 63.4563(c)(1))**

   c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened; **(40 CFR 63.4563(d))**

   d. Deviations from work practice standards occur. **(40 CFR 63.4563(e))**

7. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.4510. **(40 CFR Part 63, Subparts A and PPPP)**

8. 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))**

9. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for emission capture systems and add-on control devices. **(40 CFR 63.4520(b))**

10. If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified in 40 CFR 63.4520(c). **(40 CFR 63.4520(c), 40 CFR 63.10(d))**

Section 1 – 52nd Street

See Appendix 8-1

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
NA	NA	NA	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, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products. **(40 CFR Part 63, Subparts A and PPPP)**

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

FGPROCESSHEATERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for existing Gas 1, (Natural Gas only) for existing Boilers and Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These existing boilers or process heaters must comply with this subpart no later than January 31, 2016, except as provided in 40 CFR 63.6(i).

Emission Units: EUEASTPOWERWASH, EUSPINELLEHEATER1, EUSPINELLEHEATER2, EUWESTMASKWASH1, EUWESTMASKWASH2

The collection at a major source of all existing industrial, commercial, and institutional boilers and process heaters within the units designed to burn gas 1 fuel subcategory as defined in 40 CFR 63.7575. At the time of permit renewal:

Less than 5 MMBtu/hr	EUSPINELLEHEATER2, EUWESTMASKWASH1, EUWESTMASKWASH2
Equal to or greater than 5 MMBtu/hr and less than 10 MMBtu/hr	EUEASTPOWERWASH, EUSPINELLEHEATER1
Equal to or greater than 10 MMBtu/hr	N/A

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall only burn natural gas as defined in 40 CFR 63.7575. **(40 CFR 63.7499(l))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler or process heater at the source. **(40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)**

2. The permittee must operate and maintain affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**

3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. **(40 CFR 63.7500(b))**

4. The permittee must:
   a. Complete a tune-up every 5 years (61 months) for boilers/process heaters less than or equal to 5 million Btu per hour. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**
   b. Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**
   c. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. **(40 CFR 63.7540(a)(10), 40 CFR 63.7515(d))**
   d. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. **(40 CFR 63.7540(a)(13))**
   e. Follow the procedures described in SC IX 4.a through SC IX 4.f for all initial and subsequent tune ups. **(40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)**
   f. Complete the Initial tune ups on all affected units no later than January 31, 2016, except as provided in **40 CFR 63.7510(j)** and **40 CFR 63.7540(a)(13)**.

5. The permittee must complete the one-time energy assessment no later than January 31, 2016. **(40 CFR 63.7510(e))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**

2. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. **(40 CFR 63.7560(a), (b), and (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))**

4. The permittee must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60th day following the completion of the initial compliance demonstrations

for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following information. **(40 CFR 63.7545(e))**

a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. **(40 CFR 63.7545(e)(1))**

b. Certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR 63.7545(e)(8))**

   i. This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR Part 63, Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi). **(40 CFR 63.7545(e)(8)(i))**

   ii. This facility has had an energy assessment performed according to 40 CFR 63.7530(e). **(40 CFR 63.7545(e)(8)(ii))**

5. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report, according to paragraph (h) of 40 CFR 63.7550, stated in SC VII.7, by the date in Table 9 of 40 CFR Part 63, Subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below. For units that are subject only to a requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.4.a, biennial tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.4.b, or 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.4.c, and not subject to emission limits or operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below, instead of a semiannual compliance report. **(40 CFR 63.7550(b))**

   a. The first semiannual compliance report must cover the period beginning on January 31, 2016 and ending on December 31. When submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on January 31, 2016 and ending on December 31 within 1, 2, or 5 years, as applicable, after the compliance date that is specified in 40 CFR 63.7495. **(40 CFR 63.7550(b)(1))**

   b. The first semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the first calendar half after January 31, 2016. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(2), 40 CFR 63.7550(b)(5))**

   c. Each subsequent semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. **(40 CFR 63.7550(b)(3))**

   d. Each subsequent semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(4), 40 CFR 63.7550(b)(5))**

6. The permittee must include the following information in the compliance report. **(40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))**

   a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**

   b. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**

   c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**

   d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**

   e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii)**

7. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below. **(40 CFR 63.7550(h))**
   a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (*http://www.epa.gov/ttn/chief/cedri/index.html*), once the XML schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90-days after the form becomes available in CEDRI. **(40 CFR 63.7550(h)(3))**

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, for existing boilers and process heaters, unless an extension has been granted per 40 CFR 63.6(i). **(40 CFR 63.7495(b))**

2. The permittee must be in compliance with the applicable work practice standards. **(40 CFR 63.7505(a))**

3. For affected sources (as defined in 40 CFR 63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. **(40 CFR 63.7515(g))**

4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: **(40 CFR 63.7540(a))**
   a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
   b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
   c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.7540(a)(10)(iii))**
   d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
   e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
   f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below. **(40 CFR 63.7540(a)(10)(vi))**

i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**

ii. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**

iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**

5. If the boiler or process heater has a heat input capacity of less than or equal to 5 million Btu per hour, the permittee may delay the burner inspection specified in SC IX 4.a until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. **(40 CFR 63.7540(a)(12))**

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

FGNSPSJJJJ
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for any new spark ignition emergency engine that commenced construction after June 12, 2006 and was manufactured on or after January 1, 2009 at major sources of Hazardous Air Pollutants per 40 CFR Part 60 Subpart JJJJ.

Emission Unit: EUPSVGENSET

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. HC + NOx	12.1 g/kW-hr	Instantaneous	EUPSVGENSET	SC VI.2	**40 CFR 60.4231(c) 40 CFR 90.103**
2. NMHC + NOx	11.3 g/hp-hr	Instantaneous	EUPSVGENSET	SC VI.2	**40 CFR 60.4231(c) 40 CFR 90.103**
3. CO	610 g/hp-hr	Instantaneous	EUPSVGENSET	SC VI.2	**40 CFR 60.4231(c) 40 CFR 90.103**

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas, in each engine in FGNSPSJJJJ. **(40 CFR 60.4230, R336.12313(3))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. There is no time limit on the use of emergency stationary RICE in emergency situations. **(40 CFR 60.4243(d)(1))**

2. The permittee may operate each engine in FGNSPSJJJJ for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. **(40 CFR 60.4243(d)(2))**

3. Each engine in FGNSPSJJJJ may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as provided in 40 CFR 60.4243(d)(2). The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity. **(40 CFR 60.4243(d)(3))**

4. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: **(40 CFR 60.4243(d)(3)(i))**

a. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
b. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
c. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
d. The power is provided only to the facility itself or to support the local transmission and distribution system.
e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching.

5. The permittee shall operate and maintain each engine in FGNSPSJJJJ such that it meets the emission limits in SC I.1, I.2, and I.3 over the entire life of the engine. **(40 CFR 60.4234, 40 CFR 60.4243(b))**

6. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year, the permittee shall meet the following requirements for FGNSPSJJJJ:
   a. Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions,
   b. Keep a maintenance plan and the permittee may only change those engine settings that are permitted by the manufacturer. If you do not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine, and
   c. Meet the requirements as specified in 40 CFR Part 1068 Subparts A through D.

   If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine and be subject to SC III.5. **(40 CFR 60.4243(b)(1))**

7. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for each engine in FGNSPSJJJJ and shall, to the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4243(b)(2))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Each engine in FGNSPSJJJJ shall be certified to meet the applicable emission standard of 40 CFR 60.4233. The permittee shall install and configure each engine according to the manufacturer's specifications. **(40 CFR 60.4243)**

2. The permittee shall equip and maintain each engine with non-resettable hours meters to track the operating hours. **(40 CFR 60.4237)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep records of conducted maintenance to demonstrate compliance. **(40 CFR 60.4342(a)(1))**

2. The permittee shall monitor and record the hours of operation of each engine during emergencies and non-emergencies, on a monthly, 12-month rolling, and calendar year basis, in a manner acceptable to the District

Supervisor, Air Quality Division. The permittee shall record the time of operation of each engine in FGNSPSJJJJ and the reason it was in operation during that time. **(40 CFR 60.4243)**

VII. REPORTING

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

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit the following notifications if an engine in FGNSPSJJJJ is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 60.4243(d)(3)(i) the permittee must submit and annual report including the following: **(40 CFR 60.4245(e), 40 CFR Part 60, Subparts A and JJJJ)**
   a. The company name and address where the engine is located;
   b. Date of the report and beginning and ending dates of the reporting period;
   c. Engine site rating and model year;
   d. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place;
   e. Hours spent for operation for the purposes specified in 40 CFR 60.4243(d)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 60.4243(d)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, as they apply to each engine in FGNSPSJJJJ. Compliance with the provisions of Subpart JJJJ ensures compliance with 40 CFR Part 63, Subpart ZZZZ. **(40 CFR Part 60 Subparts A & JJJJ, 40 CFR Part 63, Subpart ZZZZ, 40 CFR 63.6590)**

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

FGRULE287(2)(c)
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a and 287(2)(c).

Emission Units: EUWESTASSEMBLY, EUEASTSAMPLEBOOTH1, EUEASTSAMPLEBOOTH2

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	Per month, as applied, minus water, per emission unit	NA	**R 336.1287(2)(c)(i)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Any exhaust system 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 owner or operator 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. **(R 336.1287(2)(c)(ii))**

V. TESTING/SAMPLING

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 DEQ, 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))**

See Appendix 4-1

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 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.

Emission Units: EUWASTESOLVRC, EUASSEMBLYOPS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(2)(a)(i))**

2. Each emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(2)(a)(ii))**

   a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.
   (R 336.1290(2)(a)(ii)(A))

   b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(B))**

   c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(2)(a)(ii)(C))**

   d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month.
   (R 336.1290(2)(a)(ii)(D))

   e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month. **(R 336.1290(2)(a)(ii)(E))**

3. Each emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all of the following provisions are met: **(R 336.1290(2)(a)(iii))**

a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**

b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**

c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**

2. The following requirements apply to emission units utilizing control equipment:

   a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: **(R 336.1290(2)(b)(i))**
      i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
      ii. Wet scrubbers equipped with a liquid flow rate monitor.
      iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.

   b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the owner or operators shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. **(R 336.1290(2)(b)(ii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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 DEQ, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**

   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**

   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**

   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**

d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**

e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**

f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**

   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**

   b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4-1

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 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGCOLDCLEANER
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUMAINTCLEANER

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

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 8-1

Section 1 – 52nd Street

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

At the time of 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 1-1. 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_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental Quality	NO_x	Oxides of Nitrogen
		ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10 microns in diameter
NAAQS	National Ambient Air Quality Standards		
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	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
		µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

Appendix 2-1. 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 3-1. Monitoring Requirements

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

Appendix 4-1. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EUPRIMEMANUAL, EUBASEMANUAL, EUCLEARMANUAL, and FGEASTPAINT. Alternative formats must be approved by the AQD District Supervisor.

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Appendix 4-1.A

Total VOC emissions for single and two component coatings

TIME PERIOD :
Applicator

	A	B *	C	D	E=(AxB)+(CxD)	F = (100-DS)/100
COATING	GALLONS OF COATING RESIN AS APPLIED	LBS OF VOC/GAL OF RESIN COMPONENT AS APPLIED/MIXED	GAL OF CATALYST USED	LBS OF VOC PER GAL OF CATALYST USED	LBS OF VOC	Control Factor DS=destruction eff. %

TOTAL UNCONTROLLED LBS VOC = G = SUM OF ALL E's	G	
LBS CONTROLLED VOC = H = G x F	H	
Tons VOC emitted this day = J = H/2000	J	
Tons of VOC's emitted 364 previous days = K	K	
Tons of VOC's emitted 365-day rolling period = L = J + K	L	
At the end of each production day: Hours/day of operation, coating line = M	M	
LBS OF VOC/HOUR = N = H/M	N	

Section 1 – 52nd Street

Appendix 4-1.B

VOC content of solvent-based coatings, no-water, with reducers

		A	B		C	D		E	F	G=(AxB)+(CxD)+(ExF)
MIX NAME	BASE RESIN DESCRIPTION	BASE RESIN RATIO	LBS OF VOC/GAL OF BASE RESIN	SOLVENT DESCRIPTION	SOLVENT RATIO	LBS OF VOC/ GAL OF SOLVENT	CATALYST DESCRIPTION	CATALYST RATIO	LBS OF VOC PER GAL OF CATALYST	LBS OF VOC/GAL OF MIX AS APPLIED
PMN Number										

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Appendix 4-1.C

VOC Purge and Clean-up solvents.

	A	B	C=(AxB)	D	E	E=(BxD)	F=(C-E)
DATE	**TOTAL CLEAN PURGE USED (GALLONS)**	LBS OF VOC/GAL OF CLEAN PURGE	LBS OF VOC USED	**TOTAL WASTE (GALLONS)**	**LBS OF VOC/GAL OF WASTE**	LBS OF VOC OF WASTE	LBS OF VOC EMITTED

TOTAL UNCONTROLLED LBS VOC = G = SUM OF ALL F's G

Tons VOC emitted this day = H = G/2000 H

Tons of VOC's emitted 364 previous days = I I

Tons of VOC's emitted 365-day rolling period = J = I + H J

At the end of each production day:
Hours/day of operation, coating line = K K

LBS OF VOC/HOUR = L = H/K L

Appendix 5-1. Testing Procedures

The permittee shall use the following federal Reference Test Methods to measure the pollutant emissions for the applicable requirements referenced in FGEASTPAINT, FGWESTROBOPAINT, FGWESTMANUAL, FGWESTMISPAINT, FGSUBPARTPPPP. Any alternatives to the following test methods shall be approved by the Air Quality Division or the U.S. EPA where applicable.

1. VOC- Reference Method 25A.
2. VOC- Reference Method 24

Appendix 6-1. 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-N2079-2012. 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-N2079-2012 is being reissued as Source-Wide PTI No. MI-PTI-N2079-2017.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

Appendix 7-1. Emission Calculations

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

Appendix 8-1. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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

Appendix 9-1. Operation and Maintenance Plan

The permittee shall develop and implement an Operation and Maintenance Plan for the facility. At a minimum, this plan shall address the preventative maintenance of the coating lines and associated capture and control systems. Any modifications shall be submitted to the AQD District Supervisor prior to the issuance of this permit. Any modifications and subsequent changes to the plan by the Company shall be promptly submitted to the AQD Grand Rapids District Supervisor.

Section 2 - Barden Plating

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 states 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. **(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(8))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.

37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
    c. 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, MDEQ.[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, MDEQ, 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:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	249.0 tons per year	12-month rolling time period as determined at the end of each calendar month	All process equipment at the stationary source including equipment covered by other permits, grand-fathered equipment, and exempt equipment	SC VI.1, VI.2	**R 336.1213(2)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content, and density of any coating, reducer, and/or solvent, as applied and as received, may be determined from manufacturer's formulation data. The VOC content of any other material may be determined from Safety Data Sheet. **(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 last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1213(3))**

2. The permittee shall calculate and record the stationary Source-wide emission rates in tons, of volatile organic compounds for each calendar month and each 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep the records using stack test data when available, mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(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 8-2

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
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

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

C. EMISSION UNIT 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
EUCONDITIONER	Conditioner tank containing 1,3-dichloro-2-propanol (DCP). This tank is controlled by a packed bed scrubber with mist eliminator. Stack ID SVK-1.	08/22/2005/ 07/5/2017	NA
EUPREETCHTANK	A pre-etch tank containing propylene carbonate and y-butyrolactone used to pre-etch plastic parts prior to plating for the production of exterior plastic automotive parts. Stack ID SVK-1.	9/1/2020, 3/17/2022	NA
EUCHROMEETCH1	Chromic acid etch tank containing chromic acid and hydrochloric acid. This tank is controlled by a composite mesh pad scrubber. Stack ID SVK-2	08/22/2005	FGCHROME1
EUCHROMEETCH2	Chromic acid etch tank containing chromic acid and hydrochloric acid. This tank is controlled by a composite mesh pad scrubber. Stack ID SVK-2.	08/22/2005	FGCHROME1
EUCHROMEETCH3	Chromic acid etch tank containing chromic acid and hydrochloric acid. This tank is controlled by a composite mesh pad scrubber. Stack ID SVK-2.	08/22/2005	FGCHROME1
EUNEUTRALIZER	Process tank containing sulfuric acid. Stack ID SVK-3.	08/22/2005	FGNEUTCATACC
EUCATALYST	Process tank containing hydrochloric acid. Stack ID SVK-3.	08/22/2005	FGNEUTCATACC
EUACCELERATOR	Process tank containing hydrochloric acid. Stack ID SVK-3.	08/22/2005	FGNEUTCATACC
EUELECTROLESSNI	This tank can conduct electroless nickel plating and is controlled by a packed bed scrubber with mist eliminators. The tank will either contain either nickel or copper. Stack ID SVK-4.	08/22/2005	NA

Section 2 – Barden Plating

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUELECTROLESSCU	This tank can conduct electroless copper plating and is controlled by a packed bed scrubber with mist eliminators. The tank will contain either copper or nickel. Stack ID SVK-4.	08/22/2005	NA
EUCOPPERSTRIKE	Copper strike tank containing copper sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER1	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER2	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER 3	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER4	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUACIDCOPPER5	Process tank containing copper sulfate, ferrous sulfate and sulfuric acid. Stack ID SVK-5.	08/22/2005	FGCOPPER
EUSEMIBRINI1	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-6.	08/22/2005	FGSEMINICKEL
EUSEMIBRINI2	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-6.	08/22/2005	FGSEMINICKEL
EUSEMIBRINI3	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-6.	08/22/2005	FGSEMINICKEL
EUSEMIBRINI4	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-6.	08/22/2005	FGSEMINICKEL
EUSEMIBRINI5	Semi-brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-5.	08/22/2005	FGSEMINICKEL

Section 2 – Barden Plating

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBRINICKEL1	Brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-7.	08/22/2005	FGBRIMICRONI
EUBRINICKEL2	Brite nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-7.	08/22/2005	FGBRIMICRONI
EUMICRONI	Micro-porous nickel plating tank containing nickel sulfate, nickel chloride, formaldehyde and boric acid. Stack ID SVK-7.	08/22/2005	FGBRIMICRONI
EUCHROME1	Decorative chrome electroplating tank with composite mesh pad scrubber and fume suppressant for control. Stack ID SVK-8.	08/22/2005	FGCHROME2
EUCHROME2	Decorative chrome electroplating tank with composite mesh pad scrubber and fume suppressant for control. Stack ID SVK-8.	08/22/2005	FGCHROME2
EUCHROME3	Decorative chrome electroplating tank with composite mesh pad scrubber and fume suppressant for control. Stack ID SVK-8.	08/22/2005	FGCHROME2
EUCHROMESTRIP	Chrome strip tank containing sodium hydroxide controlled by a packed bed scrubber with mist eliminators. Stack ID SVK-9.	08/22/2005	FGSTRIPTANKS
EUNITRICSTRIP	Nitric acid strip tank controlled by a packed bed scrubber with mist eliminators. Stack ID SVK-9.	08/22/2005	FGSTRIPTANKS
EUEMERGENCYRICE-SI	42 brake-horsepower, natural gas fueled (spark ignition) emergency generator, installed prior to June 12, 2006.	8/22/2005	FGEMERGENCYRICE-SI
EUEMERGENCYRICE-CI	435 brake-horsepower, diesel fueled (compression ignition) emergency generator, rated at and was installed during the summer of 1999	07/01/1999	FGEMERGENCYRICE-CI
EUBOILER1	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS
EUBOILER2	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS
EUBOILER3	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS
EUBOILER4	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS
EUBOILER5	1.8 MMBtu/hr natural gas-fired boiler	08/22/2005	FGBOILERS

EUCONDITIONER
EMISSION UNIT CONDITIONS

DESCRIPTION

Conditioner tank containing 1,3-dichloro-2-propanol (DCP).

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Packed bed scrubber with mist eliminator.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. 1,3-dichloro-2-propanol	0.7 pph[2]	Hourly	EUCONDITIONER	SC V.1 SC VI.1, VI.2	**R 336.1225** **R 336.1702(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUCONDITIONER unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the packed bed scrubber with mist eliminators and the monitoring equipment required to record the pressure drop across the packed bed scrubber.[2] **(R 336.1225, R 336.1702(a), R 336.1910)**

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUCONDITIONER unless the packed bed scrubber with mist eliminator is installed, maintained, and operated in a satisfactory manner. Proper operation includes maintaining the pressure drop, the water recirculation rate, and the fresh water feed rate in the ranges specified in the Operation and Maintenance Plan, as approved by the AQD District Supervisor.[2] **(R 336.1225, R 336.1702(a), 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. Within every 48 months from the date of completion of the most recent stack test, the permittee shall verify 1,3-dichloro-2-propanol emission rates from EUCONDITIONER by testing at owner's expense, in accordance with Department requirements.[2] **(R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**

See Appendix 5-2

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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the pressure drop across the packed bed scrubber.[2] **(R 336.1225, R 336.1702(a), R 336.1910)**

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner devices to monitor and record the scrubber water recirculation rate and the scrubber fresh water feed rate of the packed bed scrubber.[2] **(R 336.1225, R 336.1702(a), R 336.1910)**

3. The permittee shall keep records of daily pressure drop of the packed bed scrubber.[2] **(R 336.1225, R 336.1702(a))**

4. The permittee shall keep records of the water recirculation rate and the fresh water feed rate of the packed bed scrubber.[2] **(R 336.1225, R 336.1702(a))**

4. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan.[2] **(R 336.1225, R 336.1702(a), R 336.1910)**

See Appendix 9-2

VII. REPORTING

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

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.[2] **(R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.[2] **(R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.[2] **(R 336.2001(5))**

See Appendix 8-2

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. SVK-1	18[1]	100[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

EUELECTROLESSNI
EMISSION UNIT CONDITIONS

DESCRIPTION

Electroless nickel plating tank which is an optional process to the electroless copper identified in EUELECTROLESSCU. Only one or the other is in operation at any one time.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Packed bed scrubber with mist eliminator.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Nickel	0.0014 pph[1]	Hourly	EUELECTROLESSNI	SC VI.1	**R 336.1225**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUELECTROLESSNI unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the packed bed scrubber with mist eliminators and the monitoring equipment required to record the pressure drop across the packed bed scrubber.[2] **(R 336.1224, R 336.1225, R 336.1910)**

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUELECTROLESSNI unless the packed bed scrubber with mist eliminators is installed, maintained, and operated in a satisfactory manner.[2] **(R 336.1224, R 336.1225, 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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop across the packed bed scrubber.[2] **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. **(R 336.1213(3))**

See Appendix 9-2

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 8-2

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. SVK-4	46[1]	60[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

EUELECTROLESSCU
EMISSION UNIT CONDITIONS

DESCRIPTION

Electroless copper plating tank which is an optional process to the electroless nickel identified in EUELECTROLESSNI. Only one or the other is in operation at any one time.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Packed bed scrubber with mist eliminator.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Formaldehyde	2.97 pph[2]	Hourly	EUELECTROLESSCU	SC V.1	**R 336.1225 R 336.1702(a)**
2. Methanol	12.2 pph[2]	Hourly	EUELECTROLESSCU	SC V.1	**R 336.1225 R 336.1702(a)**
3. VOC	Less than 36 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUELECTROLESSCU	SC VI.2, VI.3, VI.4	**R 336.1205(3) R 336.1225 R 336.1702(a)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUELECTROLESSCU unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the packed bed scrubber with mist eliminators and the monitoring equipment required to record the pressure drop across the packed bed scrubber.[2] **(R 336.1225, R 336.1702(a), R 336.1910)**

2. The permittee shall not operate EUELECTROLESSCU for more than 4746 hours per 12-month rolling time period as determined at the end of each calendar month unless, after testing it is determined that the actual emission rates of formaldehyde and methanol from EUELECTROLESSCU are lower than the emission limits specified in SC I.1-3, then the permittee may use the following equation to determine maximum hours of operation:[2] **(R 336.1205, R 336.1225, R 336.1702(a))**

   a. 71,999 lbs/year / (Actual Formaldehyde emission rate + Actual Methanol emission rate) = maximum hours of operation

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUELECTROLESSCU unless the packed bed scrubber with mist eliminators is installed, maintained, and operated in a satisfactory manner.[2] **(R 336.1225, R 336.1702(a), 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. Within every 48 months from the date of completion of the most recent stack test thereafter, the permittee shall verify formaldehyde and methanol emission rates from EUELECTROLESSCU by testing at owner's expense, in accordance with Department requirements. **(R 336.2001, R 336.2003, R 336.2004 R 336.1213(3))**

See Appendix 5-2

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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop across the packed bed scrubber.[2] **(R 336.1225, R 336.1702(a), R 336.1910)**

2. The permittee shall monitor and record the hours of operation for EUELECTORLESSCU.[2] **(R 336.1205, R 336.1225, R 336.1702(a))**

3. The permittee shall keep, in a satisfactory manner, records of the hours of operation of EUELECTROLESSCU, on a 12-month rolling time period basis, as determined at the end of each calendar month.[2] **(R 336.1205, R 336.1225, R 336.1702, R 336.1910)**

4. The permittee shall calculate, in a satisfactory manner, the monthly and 12-month rolling time period VOC emission rate from EUELECTROLESSCU.[2] **(R 336.1205, R 336.1225, R 336.1702(a))**

5. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. **(R 336.1213(3))**

See Appendix 9-2

VII. REPORTING

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

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.[2] **(R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.[2] **(R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.[2] **(R 336.2001(5))**

See Appendix 8-2

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. SVK-4	46[1]	60[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

D. FLEXIBLE GROUP 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
FGCHROME1	This group consists of 3 chrome etch tanks, a chrome conversion unit, and a chrome recovery unit controlled by a common composite mesh pad scrubber.	EUCHROMEETCH1 EUCHROMEETCH2 EUCHROMEETCH3
FGNEUTCATACC	This group consists of the neutralizer, catalyst, and accelerator process tanks exhausted from a common stack, no emission controls.	EUNEUTRALIZER EUCATALYST EUACCELERATOR
FGCOPPER	This group consists of the copper electroplating tanks which are exhausted by a common stack, no emission controls.	EUCOPPERSTRIKE EUACIDCOPPER1 EUACIDCOPPER2 EUACIDCOPPER3 EUACIDCOPPER4 EUACIDCOPPER5
FGSEMINICKEL	This group consists of 5 semi-brite nickel electroplating tanks which are exhausted by a common stack, no emission controls.	EUSEMIBRINI1 EUSEMIBRINI2 EUSEMIBRINI3 EUSEMIBRINI4 EUSEMIBRINI5
FGBRIMICRONI	This group consists of the brite and micro-porous electroplating tanks which are exhausted by a common stack, no emission controls	EUBRINICKEL1 EUBRINICKEL2 EUMICRONI
FGCHROME2	This group consists of the decorative chrome plating tanks and a chrome recovery unit controlled by a composite mesh pad and fume suppressant control.	EUCHROME1 EUCHROME2 EUCHROME3
FGSTRIPTANKS	This group consists of the chrome strip and nitric acid strip tanks controlled by a packed bed scrubber with a mist eliminator.	EUCHROMESTRIP EUNITRICSTRIP
FGEMERGENCYRICE-SI	All existing emergency spark ignition engines < 500 HP, located at a major source that commenced construction or reconstruction before June 12, 2006. Compliance with the RICE MACT (40 CFR Part 63, Subpart ZZZZ) emission and operating limitations in this table shall be no later than October 19, 2013.	EUEMERGENCYRICE-SI

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGEMERGENCYRICE-CI	All existing emergency compression ignition engines < 500 HP, located at a major source that commenced construction or reconstruction before June 12, 2006. Compliance with the RICE MACT (40 CFR Part 63, Subpart ZZZZ) emission and operating limitations in this table shall be no later than May 3, 2013.	EUEMERGENCYRICE-CI
FGBOILERS	This group consists of 5, 1.8 MMBtu/hr, natural gas-fired boilers	EUBOILER1 EUBOILER2 EUBOILER3 EUBOILER4 EUBOILER5

FGCHROME1
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This group consists of 3 chrome etch tanks, a chrome conversion unit, and a chrome recovery unit controlled by a common composite mesh pad scrubber.

Emission Units: EUCHROMEETCH1, EUCHROMEETCH2, EUCHROMEETCH3

POLLUTION CONTROL EQUIPMENT

Composite mesh pad scrubber

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total Chromium	0.012 milligram per dry standard cubic meter, corrected to 70°F and 29.92 inches Hg[1]	Continuous	FGCHROME1	SC V.1	**R 336.1225**
2. Total Chromium	0.0025 pph[1]	Hourly	FGCHROME1	SC V.1	**R 336.1225**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGCHROME1 unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the composite mesh pad scrubber system and the monitoring equipment required to record the pressure drop across the composite mesh pad system.[2] **(R 336.1224, R 336.1225, R 336.1910)**

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGCHROME1 unless the composite mesh pad scrubber system is installed, maintained, and operated in a satisfactory manner.[2] **(R 336.1224, R 336.1225, 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. Within every 24 months from the date of completion of the most recent stack test thereafter, the permittee shall verify chromium emission rates from FGCHROME1 by testing at owner's expense, in accordance with Department requirements. **(R 336.2001, R 336.2003, R 336.2004, R 336.1213(3))**

See Appendix 5-2

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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the pressure drop across the composite mesh pad scrubber system on a daily basis.[2] **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall keep records of daily pressure drop readings.[1] **(R 336.1224, R 336.1225)**

3. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. **(R 336.1213(3))**

See Appendix 9-2

VII. REPORTING

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

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. **(R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5))**

See Appendix 8-2

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. SVK-2	52[1]	60[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

FGNEUTCATACC
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This group consists of the neutralizer, catalyst, and accelerator process tanks exhausted from a common stack, no emission controls.

Emission Units: EUNEUTRALIZER, EUCATALYST, EUACCELERATOR

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGNEUTCATACC unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the fan and the monitoring equipment required to monitor the fan operation.[1] **(R 336.1225)**

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. **(R 336.1213(3))**

See Appendix 9-2

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 8-2

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. SVK-3	42[1]	60[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

FGCOPPER
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This group consists of the copper electroplating tanks which are exhausted by a common stack, no emission controls.

Emission Units: EUCOPPERSTRIKE, EUACIDCOPPER1, EUACIDCOPPER2, EUACIDCOPPER3, EUACIDCOPPER4, EUACIDCOPPER5

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall not operate FGCOPPER unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the fan and the monitoring equipment required to monitor the fan operation.[1] **(R 336.1225)**

See Appendix 9-2

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 in accordance with the approved Operation and Maintenance Plan. **(R 336.1213(3))**

See Appendix 9-2

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 8-2

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. SVK-5	52[1]	60[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

FGSEMINICKEL
EMISSION UNIT CONDITIONS

DESCRIPTION

This group consists of 5 semi-brite nickel electroplating tanks which are exhausted by a common stack, no emission controls.

Emission Units: EUSEMIBRINI1, EUSEMIBRINI2, EUSEMIBRINI3, EUSEMIBRINI4, EUSEMIBRINI5

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Nickel	0.028 pph[1]	Hourly	FGSEMINICKEL	SC V.1	**R 336.1225**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGSEMINICKEL unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the fan and the monitoring equipment required to monitor the fan operation.[1] **(R 336.1225)**

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Within every 48 months from the date of completion of the most recent stack test thereafter, the permittee shall verify nickel emission rates from FGSEMINICKEL by testing at owner's expense, in accordance with Department requirements. **(R 336.2001, R 336.2003, R 336.2004, R 336.1213(3))**

See Appendix 5-2

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 in accordance with the approved Operation and Maintenance Plan. **(R 336.1213(3))**

See Appendix 9-2

VII. REPORTING

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

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. **(R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5))**

See Appendix 8-2

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. SVK-6	52[1]	60[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

FGBRIMICRONI
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This group consists of the brite and micro-porous electroplating tanks which are exhausted by a common stack, no emission controls

Emission Units: EUBRINICKEL1, EUBRINICKEL2, EUMICRONI

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Nickel	0.28 pph[1]	Hourly	FGBRIMICRONI	SC V.1	**R 336.1225**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGBRIMICRONI unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the fan and the monitoring equipment required to monitor the fan operation.[1] **(R 336.1225)**

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Within every 48 months from the date of completion of the most recent stack test thereafter, the permittee shall verify nickel emission rates from FGBRIMICRONI by testing at owner's expense, in accordance with Department requirements. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004))**

See Appendix 5-2

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 in accordance with the approved Operation and Maintenance Plan.[2] **(R 336.1201(3))**

2. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal.[1] **(R 336.1225(4))**

See Appendix 9-2

VII. REPORTING

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

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. **(R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5))**

See Appendix 8-2

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. SVK-7	42[1]	60[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

FGCHROME2
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This group consists of the decorative chrome plating tanks and a chrome recovery unit controlled by a composite mesh pad and fume suppressant control subject to the Chromium Electroplating NESHAP.

Emission Units: EUCHROME1, EUCHROME2, EUCHROME3

POLLUTION CONTROL EQUIPMENT

Composite mesh pad scrubber and fume suppressant for control.

I. EMISSION LIMIT(S

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total chromium	0.005 milligram per dry standard cubic meter, corrected to 70°F and 29.92 inches Hg [2]	Continuous	FGCHROME2	SC V.1 SC VI.1, VI.2, VI.3, VI.4, VI.5, VI.6, VI.7	**R 336.1225, R 336.1941, 40 CFR Part 63 Subparts A & N**
2. Total chromium	0.0006 pph[1]	Hourly	FGCHROME2	SC V.1 SC VI.4, VI.5, VI.6, VI.7	**R 336.1225**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGCHROME2 unless the chemical fume suppressant is applied in quantities and at a frequency to ensure the surface tension of each tank in FGCHROME2 does not exceed 45 dynes/cm (3.1x10-3 pound-force per foot) at any time during operation.[2] **(R 336.1225, R 336.1910)**

2. The permittee shall maintain and implement the approved Operation and Maintenance Plan. The plan shall contain all information required by 40 CFR 63.342(f)(3)(i), which includes the following:[2] **(R 336.1225, R 336.1910, R 336.1941**, **40 CFR 63.342(f)(3)(i))**

   a. Operation and maintenance criteria for FGCHROME2, add-on control device(s), and for the process and control device(s) monitoring equipment as well as a standardized checklist to document the operation and maintenance of the equipment;
   b. The work practice standards for the add-on control device(s) and monitoring equipment;
   c. Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and

d. A systematic procedure for identifying process equipment, add-on control device(s) and monitoring equipment malfunctions and for implementing corrective actions to address such malfunctions.

3. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the Preventative Maintenance/Operation and Maintenance/Malfunction Abatement Plan, the permittee shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event. **(R 336.1941, 40 CFR 63.342(f)(3)(E)(iv))**

4. If the Operation and Maintenance Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Operation and Maintenance Plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. **(R 336.1941, 40 CFR 63.342(f)(3)(ii))**

5. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan. **(R 336.1941, 40 CFR 63.342(f)(1)(i))**

6. Malfunction shall be corrected as soon as practical after their occurrence in accordance with the Operation and Maintenance Plan. **(40 CFR 63.342(f)(1)(i))**

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGCHROME2 unless the composite mesh pad scrubber system is installed, maintained, and operated in a satisfactory manner.[2] **(R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.3424)**

2. The permittee shall equip and maintain the composite mesh pad scrubber system with a differential pressure monitoring device.[2] **(R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.343(c))**

V. TESTING/SAMPLING

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

1. Within every 24 months from the date of completion of the most recent stack test thereafter, the permittee shall verify chromium emission rates from FGCHROME2 by testing at owner's expense, in accordance with Department requirements. **(R 336.2001, R 336.2003, R 336.2004, R 336.1213(3))**

See Appendix 5-2

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 monitor, in a satisfactory manner, the surface tension of FGCHROME2.[2] **(R 336.1225, R 336.1910)**

2. The permittee shall perform inspections of the composite mesh pad (CMP) system as follows:[2] **(R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.342(d) and 63.343(c))**

   a. Determine pressure drop across the CMP system on a daily basis. If the pressure drop across the control varies by more than ±2 inch of water gauge, from the pressure drop determined during compliance testing, the variation shall be documented, and the operation and maintenance procedures shall be reviewed. Any corrective action shall be documented.

b. Visually inspect the CMP system, on a quarterly basis, to ensure there is proper drainage, no chromic acid build up on the pads, and no evidence of chemical attack on the structural integrity of the control device.

c. Visually inspect the back portion of the mesh pad closest to the fan, on a quarterly basis, to ensure there is no breakthrough of chromic acid mist.

d. Visually inspect ductwork from tanks to the CMP system, on a quarterly basis, to ensure there are no leaks.

e. Perform wash-down of composite mesh pads in accordance with manufacturer's recommendations.

3. The permittee shall maintain records of inspections required to comply with applicable work practice standards of 40 CFR 63.342(f). Each inspection record shall identify the device inspected, the date, approximate time of inspection, and a brief description of the working condition of the device during the inspection. The permittee shall also record any actions taken to correct the deficiencies found during the inspection.[2] **(R 336.1225, R 336.1910, R 336.1941, 40 CFR 63.346)**

4. The permittee shall keep records of the daily pressure drop.[2] **(R 336.1941, 40 CFR Part 63.343(c)(1))**

5. The permittee shall keep records of the surface tension of each tank in FGCHROME2, the amount of chemical fume suppressant added to each tank in FGCHROME2 and the date and time of each addition.[2] **(R 336.1225, R 336.1910)**

6. The permittee shall keep records of all maintenance performed on the chrome electroplating process tank(s), control device, and monitoring equipment. **(R 336.1941, 40 CFR 63.346(b)(2))**

7. The permittee shall keep records of the occurrence, duration, and cause (if known) of each malfunction of the electroplating process, control device, and monitoring equipment. **(R 336.1941, 40 CFR 63.346(b)(3))**

8. The permittee shall keep records of actions taken during periods of malfunction when such actions are inconsistent with the Operation and Maintenance Plan. **(R 336.1941, 40 CFR 63.346(b)(4))**

9. The permittee shall keep records of monitoring data that are used to demonstrate compliance with the standard for decorative chrome electroplating tank(s), including the date and time the data are collected. **(R 336.1941, 40 CFR 63.346(b)(8))**

10. The permittee shall record the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the decorative chrome electroplating process or monitoring equipment. **(R 336.1941, 40 CFR 63.346(b)(9))**

11. The permittee shall record the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods **other** than malfunction of the decorative chrome electroplating process or monitoring equipment. **(40 CFR 63.346(b)(10))**

12. The permittee shall record the total decorative chrome electroplating tank(s) operating time. **(R 336.1941, 40 CFR 63.346(b)(11))**

13. The permittee shall perform all applicable monitoring and recordkeeping as outlined in 40 CFR 63.343 and 40 CFR 63.346 for each decorative chrome electroplating tank at the facility. **(R 336.1941, 40 CFR 63.343, 40 CFR 63.346)**

14. The permittee shall monitor emissions and operating and maintenance information in accordance with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and N.[2] **(R 336.1941, 40 CFR Part 63, Subparts A & N)**

15. The permittee shall keep records of emission information and operating and maintenance information to comply with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and N.[2] **(R 336.1941, 40 CFR Part 63, Subparts A & N)**

See Appendix 9-2

VII. REPORTING

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

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing[2]. **(R 336.2001(3))**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.[2] **(R 336.2001(4))**

6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.[2] **(R 336.2001(5))**

7. The permittee shall submit the following notifications to the Department in accordance with 40 CFR 63.347: **(R 336.1941, 40 CFR 40 CFR 63.347)**

   a. A notification of the date when construction was commenced, submitted no later than 30 calendar days after such date.

   b. A notification of the actual date of startup of the source, submitted within 30 calendar days after such date.

   c. Notification of compliance status.

8. The permittee shall submit to the AQD a report of ongoing compliance status containing information required in 40 CFR 63.347(g)(3). This report shall be submitted semi-annually if no exceedances occurred during the reporting period and quarterly if exceedances occurred in the reporting period. **(R 336.1941, 40 CFR 63.347(g))**

9. The permittee shall perform all applicable reporting as outlined in 40 CFR 63.347. **(R 336.1941, 40 CFR 63.347)**

See Appendix 8-2

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. SVK-8	46[1]	60[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 N.[2] **(R 336.1941, 40 CFR Part 63 Subparts A & N)**

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

FGSTRIPTANKS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This group consists of the chrome strip and nitric acid strip tanks controlled by a packed bed scrubber with a mist eliminator.

Emission Units: EUCHROMESTRIP, EUNITRICSTRIP

POLLUTION CONTROL EQUIPMENT

Packed bed scrubber with mist eliminator

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGSTRIPTANKS unless the approved Operation and Maintenance Plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, the packed bed scrubber with mist eliminators and the monitoring equipment required to record the pressure drop across the packed bed scrubber.[2] **(R 336.1224, R 336.1225, R 336.1910)**

See Appendix 9-2

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGSTRIPTANKS unless the packed bed scrubber with mist eliminators is installed, maintained, and operated in a satisfactory manner.[2] **(R 336.1224, R 336.1225, 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 install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop across the packed bed scrubber.[2] **(R 336.1224, R 336.1225, R 336.1910)**

2. The permittee shall maintain records in accordance with the approved Operation and Maintenance Plan. **(R 336.1213(3))**

See Appendix 9-2

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 8-2

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. SVK-9	46[1]	60[1]	**R 336.1225**

IX. OTHER REQUIREMENT(S)

NA

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

FGEMERGENCYRICE-SI
EMISSION UNIT CONDITIONS

DESCRIPTION

Existing emergency spark ignition engines < 500 HP, located at a major source that commenced construction or reconstruction before June 12, 2006. Compliance with the RICE MACT (40 CFR Part 63, Subpart ZZZZ) emission and operating limitations in this table shall be no later than October 19, 2013.

Emission Unit: EUEMERGENCYRICE-SI

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. EUEMERGENCYRICE-SI shall be installed, maintained, and operated in a satisfactory manner. The permittee shall meet the following work practice standards as specified in 40 CFR 63.6602 and 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1. The permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.
   a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.4.
   b. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first and replace as necessary; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   If the affected source is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1)**

2. The permittee must be in compliance with the emission limitations and operating limitations in 40 CFR Part 63, Subpart ZZZZ that apply to the source at all times. **(40 CFR 63.6605(a))**

3. The permittee, at all times, must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**

4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required in Table 2c of 40 CFR Part 63, Subpart ZZZZ. **(40 CFR 63.6625(j))**

5. If the analytical results of the oil analysis program for emergency stationary engines indicate any of the following limits are exceeded, the permittee shall change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 days or before commencing operation, whichever is later. **(40 CFR 63.6625(i))**

   a. Total Acid Number increases by more than 2.0 milligrams of potassium hydroxide (KOH) per gram from when the oil was new.
   b. Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new.
   c. Percent water content (by volume) is greater than 0.5.

6. The permittee shall maintain and operate the stationary RICE per the manufacturer's emission related written instructions or develop a maintenance plan which must provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6, Item 9)**

7. The permittee shall minimize the time spent at idle during startup and minimize the startup time of the stationary RICE to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**

8. The permittee shall not exceed 100 hours per year for maintenance checks and readiness testing. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. **(40 CFR 63.6640(f)(1)(ii))**

9. The permittee may operate the EUEMERGENCYRICE-SI up to 50 hours per year for non-emergency situations but those hours are to be counted towards the 100 hours per year for maintenance and readiness testing. These 50 hours per year for non-emergency situations cannot be used for peak-shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. Up to 15 hours per year can be used as part of a demand response program. **(40 CFR 63.6640(f)(1)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUEMERGENCYRICE-SI with a non-resettable hour meter to track the number of operating hours. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

1. If using the oil analysis program, the permittee shall at a minimum analyze the oil for the Total Acid Number, Viscosity, and percent water. **(40 CFR 63.6625(i))**

See Appendix 5-2

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 records:
   a. Records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. **(40 CFR 63.6655(a)(2), 40 CFR 63.6660)**
   b. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5), 40 CFR 63.6660)**

   c. Records to demonstrate continuous compliance with operating limitations in SC III.1. **(40 CFR 63.6655(d), 40 CFR 63.6660)**

   d. Records of the maintenance conducted to demonstrate the engine and after-treatment control device (if any) were operated and maintained according to the manufacturer's emission related written instructions or developed maintenance plan. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

   e. Records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation including what classified the operation as emergency and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

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 8-2

VIII. STACK/VENT RESTRICTION(S)

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, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

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

FGEMERGENCYRICE-CI
EMISSION UNIT CONDITIONS

DESCRIPTION

Existing emergency compression ignition engines < 500 HP, located at a major source that commenced construction or reconstruction before June 12, 2006. Compliance with the RICE MACT (40 CFR Part 63, Subpart ZZZZ) emission and operating limitations in this table shall be no later than May 3, 2013.

Emission Unit: EUEMERGENCYRICE-CI

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. EUEMERGENCYRICE-CI shall be installed, maintained, and operated in a satisfactory manner. The permittee shall meet the following work practice standards as specified in 40 CFR 63.6602 and 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1. The permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.
   a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.4.
   b. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first and replace as necessary; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   If the affected source is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1)**

2. The permittee must be in compliance with the emission limitations and operating limitations in 40 CFR Part 63, Subpart ZZZZ that apply to the source at all times. **(40 CFR 63.6605(a))**

3. The permittee, at all times, must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**

4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. **(40 CFR 63.6625(j))**

5. If the analytical results of the oil analysis program for emergency stationary CI engines indicate any of the following limits are exceeded, the permittee shall change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 days or before commencing operation, whichever is later. **(40 CFR 63.6625(i))**

   a. Total Base Number is less than 30 percent of the Total Base Number of the oil when new.
   b. Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new.
   c. Percent water content (by volume) is greater than 0.5.

6. The permittee shall maintain and operate the stationary RICE per the manufacturer's emission related written instructions or develop a maintenance plan which must provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6, Item 9)**

7. The permittee shall minimize the time spent at idle during startup and minimize the startup time of the stationary RICE to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**

8. The permittee shall not exceed 100 hours per year for maintenance checks and readiness testing. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. **(40 CFR 63.6640(f)(1)(ii))**

9. The permittee may operate the EUEMERGENCYRICE-CI up to 50 hours per year for non-emergency situations but those hours are to be counted towards the 100 hours per year for maintenance and readiness testing. These 50 hours per year for non-emergency situations cannot be used for peak-shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. Up to 15 hours per year can be used as part of a demand response program. **(40 CFR 63.6640(f)(1)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUEMERGENCYRICE-CI with a non-resettable hour meter to track the number of operating hours. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

1. If using the oil analysis program, the permittee shall at a minimum analyze the oil for the Total Base Number, Viscosity, and percent water. **(40 CFR 63.6625(i))**

See Appendix 5-2

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 records:
   a. Records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. **(40 CFR 63.6655(a)(2), 40 CFR 63.6660)**
   b. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5), 40 CFR 63.6660)**

   c. Records to demonstrate continuous compliance with operating limitations in SC III.1. **(40 CFR 63.6655(d), 40 CFR 63.6660)**

   d. Records of the maintenance conducted to demonstrate the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

   e. Records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

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 8-2

VIII. STACK/VENT RESTRICTION(S)

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, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

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

FGBOILERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for existing Gas 1, (Natural Gas only) for existing Boilers/Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These existing boilers or process heaters must comply with this subpart no later than January 31, 2016, except as provided in 40 CFR 63.6(i).

Emission Units: EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4, EUBOILER5

The collection at a major source of all existing industrial, commercial, and institutional boilers and process heaters within the units designed to burn gas 1 fuel subcategory as defined in 40 CFR 63.7575. At the time of permit renewal:

Less than 5 MMBtu/hr	EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4, EUBOILER5
Equal to or greater than 5 MMBtu/hr and less than 10 MMBtu/hr	NA
Equal to or greater than 10 MMBtu/hr	NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall only burn natural gas as defined in 40 CFR 63.7575. **(40 CFR 63.7499(l))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler or process heater at the source. **(40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)**

2. The permittee must operate and maintain affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**

3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and SC III.2. **(40 CFR 63.7500(b))**

4. The permittee must:
   a. Complete a tune-up every 5 years (61 months) for boilers/process heaters less than or equal to 5 million Btu per hour. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**
   b. Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**

c. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. **(40 CFR 63.7540(a)(10), 40 CFR 63.7515(d))**

d. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. **(40 CFR 63.7540(a)(13))**

e. Follow the procedures described in SC IX 4.a through SC IX 4.f for all initial and subsequent tune ups. **(40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)**

f. Complete the Initial tune ups on all affected units no later than January 31, 2016, except as provided in **40 CFR 63.7510(j)** and **40 CFR 63.7540(a)(13)**.

5. The permittee must complete the one-time energy assessment no later than January 31, 2016. **(40 CFR 63.7510(e))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**

2. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. **(40 CFR 63.7560(a), (b), and (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))**

4. The permittee must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60th day following the completion of the initial compliance demonstrations for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following information. **(40 CFR 63.7545(e))**

   a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. **(40 CFR 63.7545(e)(1))**

   b. Certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR 63.7545(e)(8))**

i. This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR Part 63, Subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi). **(40 CFR 63.7545(e)(8)(i))**

ii. This facility has had an energy assessment performed according to 40 CFR 63.7530(e). **(40 CFR 63.7545(e)(8)(ii))**

5. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report, according to paragraph (h) of 40 CFR 63.7550, stated in SC VII.7, by the date in Table 9 of 40 CFR Part 63, Subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below. For units that are subject only to a requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.4.a, biennial tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.4.b, or 5-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.4.c, and not subject to emission limits or operating limits, the permittee may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below, instead of a semi-annual compliance report. **(40 CFR 63.7550(b))**

   a. The first semiannual compliance report must cover the period beginning on January 31, 2016 and ending on December 31. When submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on January 31, 2016 and ending on December 31 within 1, 2, or 5 years, as applicable, after the compliance date that is specified in 40 CFR 63.7495. **(40 CFR 63.7550(b)(1))**

   b. The first semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the first calendar half after January 31, 2016. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(2), 40 CFR 63.7550(b)(5))**

   c. Each subsequent semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. **(40 CFR 63.7550(b)(3))**

   d. Each subsequent semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(4), 40 CFR 63.7550(b)(5))**

6. The permittee must include the following information in the compliance report. **(40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))**

   a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**

   b. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**

   c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**

   d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**

   e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii)**

7. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below. **(40 CFR 63.7550(h))**

   a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (*http://www.epa.gov/ttn/chief/cedri/index.html*), once the XML

schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90-days after the form becomes available in CEDRI. **(40 CFR 63.7550(h)(3))**

See Appendix 8-2

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, for existing boilers and process heaters, unless an extension has been granted per 40 CFR 63.6(i). **(40 CFR 63.7495(b))**

2. The permittee must be in compliance with the applicable work practice standards. **(40 CFR 63.7505(a))**

3. For affected sources (as defined in 40 CFR 63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. **(40 CFR 63.7515(g))**

4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: **(40 CFR 63.7540(a))**
   a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
   b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
   c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.7540(a)(10)(iii))**
   d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
   e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
   f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below. **(40 CFR 63.7540(a)(10)(vi))**
      i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
      ii. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
      iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**

5. If the boiler or process heater has a heat input capacity of less than or equal to 5 million Btu per hour, the permittee may delay the burner inspection specified in SC IX 4.a until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. **(40 CFR 63.7540(a)(12))**

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

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 1-2. 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_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental Quality	NO_x	Oxides of Nitrogen
		ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10 microns in diameter
NAAQS	National Ambient Air Quality Standards		
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	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
		µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

Appendix 2-2. 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 3-2. Monitoring Requirements

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

Appendix 4-2. Recordkeeping

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

Appendix 5-2. Testing Procedures

The permittee shall use the following federal Reference Test Methods to measure the pollutant emissions for the applicable requirements referenced in EUCONDITIONER, FGCHROME1, FGBRIMICRONI, FGCHROME2 Any alternatives to the following test methods shall be approved by the Air Quality Division or the USEPA where applicable.

1. Formaldehyde – Reference Method 316.
2. Total Chromium – Reference Method 29.
3. Hexavalent Chromium – Reference Method 306
4. Nickel – Reference Method 29.
5. 1,3 Dichloro-2-propanol - Reference Method 18.
6. Methanol- Reference Method 308
7. VOC – Reference Method 25A

Appendix 6-2. 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-N2079-2012. 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-N2079-2012 is being reissued as Source-Wide PTI No. MI-PTI-N2079-2017.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
157-16	NA	Increase DCP emission limit, increase stack height.	EUCONDITIONER

Appendix 7-2. Emission Calculations

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

Appendix 8-2. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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

Appendix 9-2. Operation and Maintenance Plan

The permittee shall develop and implement an Operation and Maintenance Plan for the facility. At a minimum, this plan shall address the preventative maintenance of the plating lines and associated capture and control systems. Any modifications shall be submitted to the AQD District Supervisor prior to the issuance of this permit. Any modifications and subsequent changes to the plan by the Company shall be promptly submitted to the AQD Grand Rapids District Supervisor.

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

MARCH 29, 2021

PERMIT TO INSTALL
110-18A

ISSUED TO
LACKS ENTERPRISES, INC.

LOCATED AT
4375 52ND STREET
KENTWOOD, MICHIGAN 49512

IN THE COUNTY OF
KENT

STATE REGISTRATION NUMBER
N2079

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **January 12, 2021**	
DATE PERMIT TO INSTALL APPROVED: **March 29, 2021**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H_2S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO_x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO_2	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

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

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
    a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
    b) A visible emission limit specified by an applicable federal new source performance standard.
    c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUSPINELLE	Pretreatment system for washing parts prior to coating: Includes series of spray cleaning and wash stages, as well as an anodic etch dip tank. The anodic etch dip tank will be exhausted to a chrome composite mesh pad system.	11/4/2019	FGCENTRALPAINT
EUCENTRALPAINT	Exterior plastic automotive parts automatic paint system including a primer booth, a basecoat booth, a clearcoat booth, and one natural gas fired curing oven (in-direct fired oven). VOC emissions from each booth and an oven are captured by using a Permanent Total Enclosure (PTE) and abated via a Regenerative Thermal Oxidizer (RTO). Each paint booth is equipped with a water curtain system to control particulate matter.	11/4/2019	FGCENTRALPAINT, FGSUBPARTPPPP, FGSUBPARTDDDDD
EUSOLRECLAIM	Solvent reclamation system (90% by weight).	TBD	FGCENTRALPAINT

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

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCENTRALPAINT	Pretreatment system, exterior plastic automotive parts automatic paint system, and solvent reclamation system. VOC emissions from EUCENTRALPAINT are captured by using a Permanent Total Enclosure (PTE) and abated via a Regenerative Thermal Oxidizer (RTO). Each paint booth of EUCENTRALPAINT is equipped with a water curtain system to control particulate matter. EUSPINELLE is controlled by a composite mesh pad system.	EUSPINELLE, EUCENTRALPAINT, EUSOLRECLAIM
Note: Please see MI-ROP-N2079-2017 for all special conditions related to FGSUBPARTPPPP, FGSUBPARTDDDDD, and FGFACILITY		

FGCENTRALPAINT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Pretreatment system, exterior plastic automotive parts automatic paint system, and solvent reclamation system.

Emission Unit: EUSPINELLE, EUCENTRALPAINT, EUSOLRECLAIM

POLLUTION CONTROL EQUIPMENT

VOC emissions from EUCENTRALPAINT are captured by using a Permanent Total Enclosure (PTE) and abated via a Regenerative Thermal Oxidizer (RTO). Each paint booth of EUCENTRALPAINT is equipped with a water curtain system to control particulate matter. Total chromium emissions from EUSPINELLE are controlled by a composite mesh pad system.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	29.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGCENTRALPAINT	SC VI.2, SC VI.3	R 336.1702(a)
2. Total Chromium[1]	1.06E-04 pph	Hourly	EUSPINELLE portion of FGCENTRALPAINT	SC V.4	R 336.1224, R 336.1225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall recover and reclaim, recycle, or dispose of, in accordance with all applicable regulations, a minimum of 90.0 percent by weight of all purge solvents used in the EUCENTRALPAINT portion of FGCENTRALPAINT. **(R 336.1225, R 336.1702(a))**

2. The permittee shall capture all waste coatings, reducer, purge solvents *etc.* (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. **(R 336.1225, R 336.1702(a))**

3. The permittee shall handle all VOC and / or HAP containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**

4. The permittee shall not operate EUCENTRALPAINT and EUSPINELLE unless a malfunction abatement plan (MAP) as described in Rule 911(2), is implemented and maintained. The MAP shall, at a minimum, specify the following:
   a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.

b) An identification of the source and operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any booth of FGCENTRALPAINT unless the water curtain particulate control is installed and operating in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**

2. The permittee shall equip and maintain each booth of FGCENTRALPAINT with highly efficient electrostatic paint applicators or comparable technology with equivalent transfer efficiency. **(R 336.1702(a))**

3. The permittee shall not operate EUCENTRALPAINT portion of FGCENTRALPAINT unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum capture efficiency for EUCENTRALPAINT of 100 percent (by weight), a minimum VOC destruction efficiency for the RTO of 95 percent (by weight), maintaining a minimum combustion zone temperature of 1400°F, or the minimum combustion zone temperature from the most recent acceptable stack test, and a minimum retention time of 0.5 seconds. **(R 336.1205, R 336.1702(a), R 336.1910)**

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of EUCENTRALPAINT portion of FGCENTRALPAINT. **(R 336.1702(a), R 336.1910)**

5. The permittee shall not operate EUCENTRALPAINT portion of FGCENTRALPAINT unless the PTE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following: **(R 336.1702(a), R 336.1910)**

a) The direction of the air flow at all times must be into the enclosure; and either
b) The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or
c) The pressure drop across the enclosure must be at least 0.007 inch H_2O

6. The permittee shall install, calibrate, maintain and operate, in a satisfactory manner, a device to measure the average facial velocity of air or a device to monitor the pressure differential between the PTE for EUCENTRALPAINT portion of FGCENTRALPAINT and the adjacent area on a continuous basis during operation of any portion of EUCENTRALPAINT. **(R 336.1702(a), R 336.1910)**

7. The permittee shall not operate EUSPINELLE portion of FGCENTRALPAINT unless the composite mesh pad system is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the composite mesh pad system includes but is not limited to maintaining the pressure drop across the scrubber systems per manufacturer specifications or as determined during compliance testing. **(R 336.1224, R 336.1225, R 336.1910)**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content, and density of any coating 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 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. **(R 336.1702(a), R 336.1001, R 336.2003, R 336.2004, R 336.2040(5))**

2. Within 60 days from permit issuance, the permittee shall verify the VOC destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every five years, thereafter. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)**

3. Within 60 days from permit issuance, the permittee shall verify the enclosure meets the definition of PTE or verify capture efficiency of the enclosure, by testing at owner's expense, in accordance with Department requirements. The permittee must complete the test once every five years, thereafter unless the permittee has submitted a demonstration that the most recent acceptable test remains valid and representative. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)**

4. Within 90 days from permit issuance, the permittee shall verify the total chromium emission rate from EUSPINELLE portion of FGCENTRALPAINT, by testing at the owner's expense, in accordance with Department requirements. The permittee must complete the test once every five years, thereafter. Testing shall be performed using an approved EPA Method listed in 40 CFR 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1224, R 336.1225, R 336.1702, R 336.1902, R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

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

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

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component used within FGCENTRALPAINT. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

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

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

4. The permittee shall monitor and record, in a satisfactory manner, the temperature in the RTO on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. Continuous temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a), R 336.1910)**

5. The permittee shall monitor and record, in a satisfactory manner, the air flow or pressure differential between the PTE for EUCENTRALPAINT portion of FGCENTRALPAINT and the adjacent area, on a continuous basis, to verify that air is entering the PTE. Continuous pressure differential data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702)**

6. The permittee shall perform inspections of the composite mesh pad (CMP) system associated with EUSPINELLE as follows at a minimum: **(R 336.1224, R 336.1225, R 336.1910)**
   a) Determine pressure drop across the CMP system on a daily basis. If the pressure drop across the control varies by more than ±1 inch of water gauge, from the pressure drop determined during compliance testing, the permittee shall document the variation, and review the operation and maintenance procedures. The permittee shall document any corrective action.
   b) Visually inspect the CMP system, on a quarterly basis, to ensure there is proper drainage, no chromic acid build up on the pads, and no evidence of chemical attack on the structural integrity of the control device.
   c) Visually inspect the back portion of the mesh pad closest to the fan, on a quarterly basis, to ensure there is no breakthrough of chromic acid mist.
   d) Visually inspect ductwork from tanks to the CMP system, on a quarterly basis, to ensure there are no leaks.
   e) Perform wash-down of composite mesh pads in accordance with manufacturer's recommendations.

7. The permittee shall monitor continuously and record daily, in a satisfactory manner, the pressure drop across the composite mesh pad system for EUSPINELLE portion of FGCENTRALPAINT. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702)**

VII. REPORTING

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

2. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal. [1] **(R 336.1225(4))**

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-Scrubber (Scrubber)	28	57	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-RTO (Regenerative Thermal Oxidizer)	64	63	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-Oven (In-direct Natural Gas Fired Oven)	6	49	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for the surface coating of plastic parts and products by the initial compliance date. **(40 CFR Part 63, Subpart A and Subpart PPPP)**

2. 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 DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters by the initial compliance date. **(40 CFR Part 63, Subpart A and Subpart DDDDD)**

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

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

March 17, 2022

PERMIT TO INSTALL
151-19A

ISSUED TO
Lacks Enterprises Inc.

LOCATED AT
4375 52nd Street
Kentwood, Michigan 49512

IN THE COUNTY OF
Kent

STATE REGISTRATION NUMBER
N2079

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **January 11, 2022**	
DATE PERMIT TO INSTALL APPROVED: **March 17, 2022**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
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*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

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Hg	Mercury
hr	Hour
HP	Horsepower
H_2S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO_x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO_2	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
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yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

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

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
    a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
    b) A visible emission limit specified by an applicable federal new source performance standard.
    c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUPREETCHTANK	A pre-etch tank containing propylene carbonate and y-butyrolactone used to pre-etch plastic parts prior to plating for the production of exterior plastic automotive parts.	September 1, 2020 / March 17, 2022	NA

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

EUPREETCHTANK
EMISSION UNIT CONDITIONS

DESCRIPTION

A pre-etch tank containing propylene carbonate and y-butyrolactone used to pre-etch plastic parts prior to plating for the production of exterior plastic automotive parts.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOCs	510 lbs per year	12-month rolling time period as determined at the end of each calendar month	EUPREETCHTANK	SC VI.1, VI.2	R 336.1225, R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a record, in a manner acceptable to the AQD District Supervisor, of the composition of all additives used in EUPREETCHTANK and of the maximum concentration in the tank of all components of the additives that are VOCs. **(R 336.1702(a))**

2. The permittee shall calculate the VOC emission rate from EUPREETCHTANK on a monthly and 12-month rolling basis using aeration calculation methods such as Equation 4 from AP-42 chapter 12.20 or an alternate method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1702(a))**

VII. REPORTING

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

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK-1	18[1]	100[1]	R 336.1225

IX. OTHER REQUIREMENT(S)

NA

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

LACKS – PAINT CENTRAL
Environmental Operation & Preventative Maintenance (O&M) Plan

For

LACKS Enterprises, Inc.

52nd PAINT CENTRAL

4315 52nd Street
Kentwood, Michigan

Michigan SRN #N2079

PTI 110-18

March 18, 2020

Revised: November 11, 2021

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Facility Wide

Maintenance records will consist primarily of the computer based EAM preventive maintenance system. Additional maintenance records may include PM Work Orders, checklists, purchase orders, inspection records, corrective actions, repairs, test results, RTO Temperature record charts and other documents which describe the maintenance tasks and corrective actions. All records will be maintained for a minimum of five (5) years.

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Opacity	Non-certified visual observation of exhaust stacks.	Quarterly – during operation	Other than uncombined water vapor, there must be no visible emission (0% opacity) from a stack.	Record the following observations for each stack: date, time, visible emissions observed (yes/no).

Malfunction Corrective Actions:

If visible emissions are observed, notify the Maintenance Manager and/or Plant Manager to initiate immediate shut down of the affected process. The Maintenance Manager or designate will prepare a maintenance work order to determine and document the cause of the malfunction and initiate corrective actions. Record the date, time, duration, cause of the malfunction, and the corrective actions on the work order. Cease operation until normal system operation is achieved.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager or Plant manager who in turn will report the malfunction to the Protective Services Central Dispatch at 554-7180.

2.) The Environmental Manager, or designate, will make the required notifications to the MDEGLE in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager

Regenerative Thermal Oxidizer (RTO)

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Combustions chamber temperature	Thermocouple, audio and visual alarms at the control panel	Continuous	1400 – 1550 degrees F	7-day temp. chart, on file for a minimum of 5 years
Exhaust stack temperature	Thermocouple, audio and visual alarms at the control panel	Continuous	100-300 degrees F	None
Removal Efficiency	Destruction efficiency test using EPA methods	Once every 5 years	95% - 100%	Source test report, on file for a minimum of 5 years

Preventative Maintenance:

Monthly: Check control panels for dust, check temperature measurements, light bulbs, indicator lights, wiring connections. Visual inspection of the combustion, regenerative blower and motor. Lube required points. Grease fan bearings and inspect pneumatic actuators for proper operation.

Semiannually (during shut-down): inspect dampers and linkages.

Annually: inspect refractory, check RTO for hot spots, check operation of motor and observe operation of the unit. Check fan to monitor coupling. Inspect hydraulic dampers, ductwork and linkages.

Spare Parts List

Thermocouple, UV scanner, igniter and controller, coupling, and damper actuator.

Malfunction Corrective Actions

The robot booth exhaust fans will shut-down automatically if the RTO chamber temperature drops below 1,400 degrees F.

If a malfunction occurs, notify the Maintenance Manager or Plant Manager to immediately shut down the coating line and inspect the operating parameters for the system. The Maintenance Manager or designate will prepare a maintenance work order to determine the cause of the malfunction and initiate corrective actions. Record the date, time, duration, cause of the malfunction, and the corrective actions on the work order. Cease operation until normal system operation is achieved.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager and/or Plant Manager who in turn will report the malfunction to the Protective Services Central Dispatch at 554-7180.

2.) The Environmental Manager or designate, will make the required notifications to the MDEGLE in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager

Spray Booths – Water Wash - PTE

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Odors from water	Odor observation from water pits	Weekly observation of the pits	No apparent odor	Maintenance rounds
Build-up of solids in pits	Visual observation of the pits for solids accumulation	Weekly observation of the pits	No excess accumulation of solids causing odor problems	Maintenance rounds
Spray booth water curtain	Visual observation of the spray booths for breaks in the water curtain	Weekly observation of the water curtains	No breaks in the water curtains	Maintenance rounds
Airflow for VOC capture	Monitor air flow direction at the beginning and end of the line	Continuous	Airflow is into the enclosure	Factory talk
Condition of ductwork, fans and filter housings	Visual inspection of the ductwork, fans and filter housings	Monthly inspection	No cracks, gaps or air leaks	EAM records
PTE pressure drop or airflow velocity	Magnehelic	Continuous	0.007” water or 200 ft/min	Factory talk

Preventative Maintenance

Add biocide to water and pump and clean the pits as required to prevent the booth water becoming septic. All booths are cleaned at the end of each production week. Monthly inspection of the roof mounted fans, ductwork and filter housings.

Malfunction Corrective Action

Odor and build-up of sludge: pump out pits or increase discharge rate to sewer to remove water and sludge. Break in water curtain: clean booth immediately to restore proper water flow. Prepare a Maintenance Work Order to repair cracks, gaps and air leaks in fans, ductwork or housings.

Malfunction Reporting Requirements

1.) All malfunctions will be reported immediately to the Maintenance Manager and/or Plant Manager who in turn will report the malfunction to the Protective Services Central Dispatch at 554-7180.

2.) The Environmental Manager or designate, will make the required notifications to the MDEGLE in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager

Spinelle Composite Mesh Pad Exhaust and Scrubber

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Pressure drop across the CMP system	Continuous pressure drop monitoring device (water gauge)	Continuously during operation	1.55" – 3.55" WC	1.) Alarms will be recorded by the automated system. 2.) Daily pressure drop readings will be recorded by FactoryTalk
Mesh pad washdown water flow rate.	Flow meter (GPM)	During pad wash down	2 GPM minimum flow rate. Stage 1 and 2, every 6 hours for minimum 20 seconds.	Alarms for low flow will be recorded by the automated monitoring system.
Confirmation of pad wash down	Visual	Each week of operation	Flow to the wash down water collection tank	Maintenance records
Condition of CMP system	Visual inspection	Once per quarter	Proper drainage, no chromic acid build-up on the pads or gaps allowing bypass, no evidence of chemical attack on the structural integrity.	Maintenance records
Condition of the back portion of the mesh pad closest to the fan.	Visual inspection	Once per quarter	No breakthrough of chromic acid mist	Maintenance records
Ductwork from tanks to the scrubber	Visual inspection	Once per quarter	No leaks, cracks or gaps	Maintenance records
Condition of pads	Visual inspection performed under the supervision of the Plant Engineer – Plating Operations or designate.	Annual	Remove top covers – inspect for gaps around the pads which would allow air to bypass.	Composite mesh pad scrubber system – Annual PM's checklist.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager and/or Plater Supervisor who in turn will report the malfunction to the Plant Manager and the Protective Services Central Dispatch at 554-7180.

2.) The Environmental Coordinator, or designate, will make the required notifications to the MDEGLE in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager

ENVIRONMENTAL
OPERATION & PREVENTATIVE
MAINTENANCE (O&M) PLAN
for
LACKS - PAINT EAST FACILITY

4375 52nd Street
Kentwood, Michigan

Michigan SRN# 2079

Revised: November 2, 2005
Revised: March 9, 2007
Revised: May 11, 2009
Revised: July 15, 2014

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Detailed Preventative Maintenance procedures are available at the facility for review and are included by reference.

A copy of the current Renewable Operating Permit (ROP) is available on the Lacks Enterprises intranet homepage and from the Environmental Manager or designate.

Paint East - Operation & Preventative Maintenance Plan

Facility Wide Requirements

MDEQ Notification Requirements: *Applies to all control systems and air contaminants*

1. If visible emissions from any stack or a malfunction of an air cleaning device is not discovered immediately, we may have an obligation to report the malfunction and excess emissions (pollutant & quantity) to EGLE as required by Rule 912 and the Renewable Operating Permit (ROP).

2. The Environmental Manager, or designate, will investigate the malfunction and determine whether a notification is required

a) The notices to the MDEQ will be provided to ELGE as soon as possible, but no later than two (2) business days after the malfunction. Notice can be by any reasonable means including email, telephone, fax, or oral communication.

b) A written report will be provided within 10 days after the malfunction has been corrected, or within 30 days of discovery of the malfunction, whichever is first. See Rule 912(5) for the content of the written report.

c) Renewable Operating Permit deviation reports as required by general condition #21. The reports will be certified by the Responsible Official.

Records Retention Requirements: *Applies to all control systems and air contaminants*

Records regarding the equipment and processes included in this O&M plan shall be retained at the plant for a period of five (5) years. Those records include, at a minimum, Maintenance Work Requests, inspection records (EAM), corrective actions, repairs, stack test results, and RTO temperature record charts.

Paint East - Operation & Preventative Maintenance Plan

Facility Wide

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Opacity	Non-certified visual observation of exhaust stacks.	Quarterly - during operation	No visible emissions (0% opacity) from a stack other than uncombined water vapor.	Record the following quarterly stack observations: date, time, inspector, visible emissions observed (yes/no), from the RTO, manual booths (3), sample booth, oven and boiler.

Malfunction Corrective Action

If visible emissions are observed, notify the Maintenance Manager and/or Plant Manager to immediately shut down the affected process and begin an inspection of all operating parameters for the system. The inspector will prepare a Maintenance Work Request to perform a determination of the cause for the visible emissions and initiate the necessary corrective actions. Record the date, time, duration of the malfunction, who was notified, and the corrective actions on the work request.

Malfunction Reporting Requirements

All malfunctions will be reported to the Maintenance Manager or Plant Manager who will report the malfunction to Protective Services Dispatch at 554-7180. The Environmental Manager, or designate, will make the required notifications and reports to EGLE.

Primary Responsibility

Maintenance Manager

Paint East - Operation & Preventative Maintenance Plan

Regenerative Thermal Oxidizer (RTO)

Operating Variable	*Monitoring Method*	*Monitoring Frequency*	*Normal Operating Range*	*Recordkeeping Requirements*
Chamber oxidizer temperature	Thermocouple	Continuous	1400 - 1550 degrees F	7-day temp chart, on file for minimum of 5 years
Exhaust stack temperature	Thermocouple	Continuous	80 - 200 degrees F	None
Removal efficiency	Destruction efficiency test using EPA methods	As required in the ROP	95% - 100%	Source test report, on file for a minimum of 5 years.
	Audio and visual alarms at the control panel.			

Malfunction Corrective Action

The robot spray guns will shut-down automatically if the RTO chamber temperature drops below 1,400 degrees F.
If a malfunction occurs notify the Maintenance Manager and Plant Manager to immediately shut down the coating line and inspect the operating parameters for this system. The Maintenance Manager or designate will prepare a Work Request to determine the cause of the malfunction and initiate the corrective actions. Record the date, time, duration of the malfunction, who was notified, and the corrective actions on the Work Request. Cease operation until normal system operation is achieved. If applicable, modify this O&M plan to prevent a malfunction reoccurrence.

Malfunction Reporting Requirements

The Maintenance Manager or designate will immediately notify Protective Services Central Dispatch (554-7180) of the malfunction including information regarding the duration, cause, excess emissions, and corrective actions. If required, the Environmental Department Manager or designate will notify EGLE.

Primary Responsibility

Maintenance Manager and/or Plant Manager

Preventative Maintenance

Monthly: check control panels for dust, check temperature measurements, light bulbs, indicator lights, wiring connections. Visual inspection of combustion, regenerative blower and motor. Lube required points. Grease fan bearings and inspect pneumatic actuators for proper operation. Semiannually (during shut-down): inspect dampers and linkages. Annually: inspect refractory, check RTO for hot spots, check operation of motor and observe operation of the unit. Check fan to motor coupling. Inspect hydraulic dampers, ductwork and linkages.

Spare Parts List

Thermocouple, UV scanner, igniter and controller, coupling, and damper actuator.

Paint East - Operation & Preventative Maintenance Plan

Spray Booths - Water Wash

Operating Variable	*Monitoring Method*	*Monitoring Frequency*	*Normal Operating Range*	*Recordkeeping Requirements*
Odors from water	Odor observation - water pits	Daily observation of the pits	No apparent odor.	Water titration sheets
Build-up of solids in pits	Visual observation of the pits for solids accumulation	Daily observation of the pits	No excess accumulation of solids causing odor problems.	EAM records and water discharge/removal records.
Spray booth water curtain	Visual observation of the spray booths for breaks in the water curtain.	Daily observation of the water curtains.	No breaks in water curtains.	Citect
Air flow for VOC capture at the spray booths	Monitor air flow direction at booth openings: smoke tubes and Citech (automated).	Daily: "smoke" the booth openings. The Citech system is continuous.	Air flow into the booth openings.	Citect
Condition of ductwork, fans and filter housings	Visual inspection of ductwork, fans and filter housings.	Monthly inspection of the ductwork, fans and filter housings	No cracks, gaps or air leaks.	EAM records.

Malfunction Corrective Action

Odor and build-up of sludge: pump out pits or increase discharge rate to sewer to remove water and sludge. Break in water curtain: clean booth immediately to restore proper water flow. Prepare a Maintenance Work Request to repair cracks, gaps and air leaks in fans, ductwork or housings. Modify the O&M plan to incorporate actions taken to correct and prevent a reoccurrence of a malfunction.

Malfunction Reporting Requirements

Report pit odor, pit sludge build-up, and a break in the water curtain to the Process Specialist or Maintenance Manager. If cracks, gaps or air leaks are discovered in the fans, ductwork or filter housings the Maintenance Manager, or designate will notify the Manager of Environmental Quality, or designate, of the malfunction including information regarding the duration, cause, excess emissions and corrective actions implemented.

Primary Responsibility

Maintenance Manager

Preventative Maintenance

Add biocide to water and pump and clean the pits as required to prevent the booth water becoming septic. All booths are cleaned at the end of each production day and a major clean-up is performed each production week. Monthly inspection of the roof mounted fans, ductwork and filter housings.

LACKS – PAINT WEST
Environmental Operation & Preventative Maintenance (O&M) Plan

For

LACKS Enterprises, Inc.

52nd PAINT WEST

4245 52nd Street
Kentwood, Michigan

Michigan SRN #N2079

MI-ROP-N2079-2017

Revised: March 9, 2007
Revised: May 11, 2009
Revised: November 18, 2019

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Detailed Preventative Maintenance procedures are available at the facility for review and are included by reference

A copy of the current Renewable Operating Permit (ROP) is available on the company intranet and from the Environmental Manager or designate.

Facility Wide

Maintenance records will consist primarily of the computer based EAM preventive maintenance system. Additional maintenance records may include PM Work Orders, checklists, purchase orders, inspection records, corrective actions, repairs, test results, RTO Temperature record charts and other documents which describe the maintenance tasks and corrective actions. All records will be maintained for a minimum of five (5) years.

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Opacity	Non-certified visual observation of exhaust stacks.	Quarterly – during operation	Other than uncombined water vapor, there must be no visible emission (0% opacity) from a stack.	Record the following observations for each stack: date, time, visible emissions observed (yes/no).
Condition of the automated alarm system	Test each alarm for proper operation	Each quarter	The sensor sends an alarm signal and the alarm is recorded.	The test results and corrective actions will be recorded in Preventive Maintenance (PM) program.

Malfunction Corrective Actions:

If visible emissions are observed, notify the Maintenance Manager and/or Plant Manager to initiate immediate shut down of the affected process. The Maintenance Manager or designate will prepare a maintenance work order to determine the cause of the malfunction and initiate corrective actions. Record the date, time, duration, cause of the malfunction, and the corrective actions on the work order. Cease operation until normal system operation is achieved.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager or Plant manager who in turn will report the malfunction to the Protective Services Central Dispatch at 554-7180.

2.) The Environmental Manager, or designate, will make the required notifications to the MDEGLE in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager

Regenerative Thermal Oxidizer (RTO)

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Chamber oxidizer temperature	Thermocouple, audio and visual alarms at the control panel	Continuous	1400 – 1550 degrees F	7-day temp. chart, on file for a minimum of 5 years
Exhaust stack temperature	Thermocouple, audio and visual alarms at the control panel	Continuous	100-300 degrees F	None
Removal Efficiency	Destruction efficiency test using EPA methods	As require in the ROP	95% - 100%	Source test report, on file for a minimum of 5 years

Preventative Maintenance:

Monthly: check control panels for dust, check temperature measurements, light bulbs, indicator lights, wiring connections. Visual inspection of combustion chamber, regenerative blower and motor. Lube required points. Grease fan bearings and change inlet air filters.

Semiannually (during shut-down): Remove and clean UV flame monitor lens.

Annually: Check hydraulic fluid heaters, inspect refractory, replace PC battery, check connections and look for hot spots, check operation of motor and observe unit operation, inspect dampers, linkages, and ducts.

Spare Parts List

Thermocouple, flame rod, igniter controller, coupling and damper actuator.

Malfunction Corrective Actions

The robot booth exhaust fans will shut-down automatically if the RTO chamber temperature drops below 1,400 degrees F.

If a malfunction occurs, notify the Maintenance Manager or Plant Manager to immediately shut down the coating line and inspect the operating parameters for the system. The Maintenance Manager or designate will prepare a maintenance work order to determine the cause of the malfunction and initiate corrective actions. Record the date, time, duration, cause of the malfunction, and the corrective actions on the work order. Cease operation until normal system operation is achieved.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager and/or Plant Manager who in turn will report the malfunction to the Protective Services Central Dispatch at 554-7180.

2.) The Environmental Manager or designate, will make the required notifications to the MDEGLE in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager

Spray Booths – Dry Filter Type

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Build-up of solids on filter	Visual observation of the filters in the spray booth	Daily observation	Filters in place to remove paint overspray from exhaust air.	None
	Differential pressure gauge	Daily observation	Differential pressure guideline: replace filters if pressure is 2" of water column or greater.	None

Preventative Maintenance

Spray booth filters are removed and replaced when differential pressure reaches 1.5" of water column or greater.
Each month a major clean-up and preventative maintenance tasks are performed on the booths and spray equipment.

Spare Parts List

Air filters, belts, sheaves and air flow gauges.

Malfunction Corrective Action

Replace the filter(s) immediately if there is a gap in the filters and air is able to be exhausted without the paint overspray being removed.

Malfunction Reporting Requirements

Report immediately to the Maintenance Manager or designate if there is a gap in the filter(s).

Primary Responsibility:

Maintenance Manager

COMPLIANCE ASSURANCE MONITORING PLAN
Lacks Enterprises, Inc.
Paint Central Facility
Revised: April 2022

I. BACKGROUND

A. Emission Unit

Description: Coating line applying solvent based paints to plastic parts.

Identification: EUCENTRALPAINT

Facility: 52nd Paint Central
4315 52nd Street
Kentwood, MI 49512

B. Applicable Regulation, Emission Unit, Monitoring Requirements

Permit to Install No.: 110-18A

VOC Emission Limits: 29.4 tons per year

Monitoring requirements: VOC emissions
Oxidizer chamber temperature (1400°F minimum)

C. Control Technology

Regenerative thermal oxidizer (RTO) installed and operating on the automatic spray booths with a nominal capacity of 50,000 SCFM. The pre-control VOC emissions are more than 100 tons annually.

The VOC laden airstream is delivered to the system by the fan which provides the motive force for the system. From the fan the stream moves to the switch valve for distribution. The switch valve is a 4-way valve which alternately directs the incoming airstream to either of the two recovery chambers. Each chamber is filled with ceramic media to provide heat recovery. The VOC-laden air travels upward through the ceramic media where it is preheated to approximately 1300°F prior to entry into the combustion chamber. The combustion chamber temperature is raised to a minimum of 1400° F by the auxiliary burner. After destruction in the combustion chamber the clean, hot airstream passes downward through the second recovery chamber where its heat is given up to the ceramic media. The cooled gas stream then discharges from the bed and passes through the 4-way valve where it is directed to the exhaust.

II. MONITORING APPROACH

Indicator ⇨	Oxidizer Chamber Temperature	Bypass interlock	Valve Timing	Work Practice & Inspection	Performance Testing
Measurement Approach	Continuously record the operating temperature of the combustion zone. The combustion chamber is monitored with 2 thermocouples, 1 each located near the top of each tower.	*NONE*.	The 4-way valve is switched based on the difference between the outlet & inlet temperature or every 3 minutes, whichever occurs first.	Inspect internal and external structural integrity to ensure proper operation as documented in the O&PM Plan	Conduct emissions test to demonstrate compliance with permitted emission limits.
Indicator Range	An excursion is less than 1400ºF	NA	An excursion occurs when the outlet temperature exceeds an alarm set point.	An excursion occurs when any finding identifies that the structural integrity has been jeopardized and operation is no longer as designed.	An excursion occurs when any finding identifies that the RTO does not provide the required destruction efficiency to meet the emission limits
Corrective Action	An excursion triggers an immediate shut down of the coating line, assessment of the problem and corrective action	NA	An alarm is activated if timing is not correct. An assessment of the problem is conducted and corrective actions implemented.	An excursion triggers an assessment of the problem and corrective action	An excursion triggers an assessment of the problem and corrective action and a reporting requirement.

III. PERFORMANCE CRITERIA

Indicator ⇨	Oxidizer Temperature	Bypass interlock	Valve Timing	Work Practice & Inspection	Performance Testing
Data Representativeness	Temperature measuring device will be accurate within 5% of full scale.	NA	Measurement of the outlet temperature will identify problems with the valve switching	Inspections of the RTO will identify problems.	A test protocol shall be prepared and approved by EGLE prior to conducting the test.
Verification of Operational Status	Temperatures are recorded on a 7-day paper chart.	NA	A thermocouple monitors the outlet temperature continuously.	Inspection records (EAM program)	NA
QA/QC Practices and Criteria	Validation and calibration of temperature system is conducted annually by a 3rd party.	NA	Valve switching is verified during RTO destruction efficiency performance testing.	NA	EPA test methods approved in protocol.
Monitoring Frequency	Continuously	NA	Continually	As required in the O&PM Plan.	As required by EGLE.
Data Collection Procedure	Recorded continually on a paper chart.	NA	NA	Record results of the inspections.	Per approved test method
Recordkeeping	Paper charts are maintained for a period of 5 years.	NA	Malfunctions and corrective actions are recorded in the PM program	Maintain inspection records for a period of 5 years.	Maintain a copy of the test report for 5 years or until another test is conducted.
Reporting	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually.	NA	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually	Submit test protocol and notification of testing to EGLE 30 days prior to test date. Submit test report 60 days after test conducting the test.

IV. JUSTIFICATION

A. Rationale for Selection of Performance Indicators

The oxidizer chamber control temperature was selected because it is indicative of the thermal oxidizer's operation. By maintaining the operating temperature at or above a minimum value, a desired level of control efficiency can be expected to be maintained. If the chamber temperature decreases significantly, complete combustion may not occur. The combustion chamber is monitored by thermocouples which are located near the top of each tower.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

The performance of the 4-way switching valve is checked continually by monitoring the RTO outlet temperature. An alarm is activated if the temperature is out of range and corrective actions are initiated.

An emissions performance test on the oxidizer is conducted as required by EGLE to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

B. Rationale for Selection of Indicator Ranges

The selected indicator range for the oxidizer chamber control temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the oxidizer is established at the operating temperature maintained during a performance test. The thermal oxidation system includes a temperature controller that maintains the desired combustion chamber temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

C. Performance Test

A periodic performance test will be conducted on or before July 1, 2026 to determine the destruction efficiency of the RTO as required by the PTI.

COMPLIANCE ASSURANCE MONITORING PLAN
Lacks Enterprises, Inc.
Paint East Facility
Revised: July 2009
Revised: June 2014
Revised: April 2022

I. BACKGROUND

A. Emission Unit

Description: Coating line applying solvent based paints to plastic parts.

Identification: FG-EAST-PAINT

Facility: 52nd Paint East
4375 52nd Street
Kentwood, MI 49512

B. Applicable Regulation, Emission Unit, Monitoring Requirements

Renewable Operating Permit No.: MI-ROP-N2079-2017

VOC Emission Limits: 45 lbs. per hour
11.1 tons per month
111.6 tons per year

Monitoring requirements: VOC emissions
Oxidizer chamber temperature (1400°F minimum)

C. Control Technology

Turner Envirologic two (2) tower regenerative thermal oxidizer (RTO) installed and operating on the automatic spray booths with a nominal capacity of 18,000 SCFM. The pre-control VOC emissions are more than 100 tons annually.

The VOC laden airstream is delivered to the system by the fan which provides the motive force for the system. From the fan the stream moves to the switch valve for distribution. The switch valve is a 4-way valve which alternately directs the incoming airstream to wither of the two recovery chambers. Each chamber is filled with ceramic media to provide heat recovery. The VOC-laden air travels upward through the ceramic media where it is preheated to approximately 1300°F prior to entry into the combustion chamber. The combustion chamber temperature is raised to a minimum of 1400° F by the auxiliary burner. After destruction in the combustion chamber the clean, hot airstream passes downward through the second recovery chamber where its heat is given up to the ceramic media. The cooled gas stream then discharges from the bed and passes through the 4-way valve where it is directed to the exhaust.

II. MONITORING APPROACH

Indicator ⇨	Oxidizer Chamber Temperature	Bypass interlock	Valve Timing	Work Practice & Inspection	Performance Testing
Measurement Approach	Continuously record the operating temperature of the combustion zone. The combustion chamber is monitored with 2 thermocouples, 1 each located near the top of each tower.	*NONE*.	The 4-way valve is switched based on the difference between the outlet & inlet temperature or every 3 minutes, whichever occurs first.	Inspect internal and external structural integrity to ensure proper operation as documented in the O&M Plan	Conduct emissions test to demonstrate compliance with permitted emission limits.
Indicator Range	An excursion is less than 1400ºF	NA	An excursion occurs when the outlet temperature exceeds an alarm set point.	An excursion occurs when any finding identifies that the structural integrity has been jeopardized and operation is no longer as designed.	An excursion occurs when any finding identifies that the RTO does not provide the required destruction efficiency to meet the emission limits
Corrective Action	An excursion triggers an immediate shut down of the coating line, assessment of the problem and corrective action	NA	An alarm is activated if timing is not correct. An assessment of the problem is conducted and corrective actions implemented.	An excursion triggers an assessment of the problem and corrective action	An excursion triggers an assessment of the problem and corrective action and a reporting requirement.

III. PERFORMANCE CRITERIA

Indicator ⇨	Oxidizer Temperature	Bypass interlock	Valve Timing	Work Practice & Inspection	Performance Testing
Data Representativeness	Temperature measuring device will be accurate within 5% of full scale.	NA	Measurement of the outlet temperature will identify problems with the valve switching	Inspections of the RTO will identify problems.	A test protocol shall be prepared and approved by EGLE prior to conducting the test.
Verification of Operational Status	Temperatures are recorded on a 7-day paper chart.	NA	A thermocouple monitors the outlet temperature continuously.	Inspection records (EAM program)	NA
QA/QC Practices and Criteria	Validation and calibration of temperature system is conducted annually by a 3rd party.	NA	Valve switching is verified during RTO destruction efficiency performance testing.	NA	EPA test methods approved in protocol.
Monitoring Frequency	Continuously	NA	Continually	As required in the O&PM Plan.	As required by EGLE.
Data Collection Procedure	Recorded continually on a paper chart.	NA	NA	Record results of the inspections.	Per approved test method
Recordkeeping	Paper charts are maintained for a period of 5 years.	NA	Malfunctions and corrective actions are recorded in the PM program	Maintain inspection records for a period of 5 years.	Maintain a copy of the test report for 5 years or until another test is conducted.
Reporting	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually.	NA	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually	Submit test protocol and notification of testing to EGLE 30 days prior to test date. Submit test report 60 days after test conducting the test.

IV. JUSTIFICATION

A. Rationale for Selection of Performance Indicators

The oxidizer chamber control temperature was selected because it is indicative of the thermal oxidizer's operation. By maintaining the operating temperature at or above a minimum value, a desired level of control efficiency can be expected to be maintained. If the chamber temperature decreases significantly, complete combustion may not occur. The combustion chamber is monitored by thermocouples which are located near the top of each tower.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

The performance of the 4-way switching valve is checked continually by monitoring the RTO outlet temperature. An alarm is activated if the temperature is out of range and corrective actions are initiated.

An emissions performance test on the oxidizer is conducted as required by EGLE to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

B. Rationale for Selection of Indicator Ranges

The selected indicator range for the oxidizer chamber control temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the oxidizer is established at the operating temperature maintained during a performance test. The thermal oxidation system includes a temperature controller that maintains the desired combustion chamber temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

C. Performance Test

A periodic performance test will be conducted on or before November 2, 2022 to determine the destruction efficiency of the RTO as required by the ROP.

COMPLIANCE ASSURANCE MONITORING PLAN
Lacks Enterprises, Inc.
Paint West Facility
March 2005
Revised: January 2017
Revised: April 2022

I. BACKGROUND

A. Emission Unit

Description: Coating line applying solvent based paints to plastic parts.

Identification: **FG-WESTROBOPAINT**

Facility: 52nd Paint West
4245 52nd Street
Kentwood, MI 49512

B. Applicable Regulation, Emission Unit, Monitoring Requirements

Renewable Operating Permit No.: MI-ROP-N2079-2017
VOC Emission Limits: 80 lbs. per day
1.0 tons per month
11.7 tons per year

Monitoring requirements: VOC emissions
Oxidizer chamber temperature (1400°F minimum)
95% minimum VOC destruction efficiency

C. Control Technology

*Haden (Smith) two (2) tower r*egenerative thermal oxidizer (RTO) installed and operating on the automatic spray booths with a nominal capacity of *24,000* SCFM. The pre-control VOC emissions are more than 100 tons annually

II. MONITORING APPROACH

Indicator ⇨	Oxidizer Chamber Temperature	Bypass interlock	Valve Timing	Work Practice & Inspection	Performance Testing
Measurement Approach	Continuously record the operating temperature of the combustion zone. *The combustion chamber temp. is monitored with a single thermocouple located in the top center of the chamber.*	The Paint West RTO was not provided with a bypass damper.	Continual monitoring with a Programmable Logic Controller (PLC) for proper timing.	Inspect internal and external structural integrity to ensure proper operation as documented in the O&M Plan	Conduct emissions test to demonstrate compliance with permitted emission limits.
Indicator Range	An excursion is less than 1400^{o}F	NA	An excursion occurs when the PLC senses the valve timing out of range and activates an alarm. *The valves are actuated every 4 minutes.*	An excursion occurs when any finding identifies that the structural integrity has been jeopardized and operation is no longer as designed.	An excursion occurs when any finding identifies that the RTO does provide the required destruction efficiency to meet the emission limits
Corrective Action	An excursion triggers an immediate shut down of the coating line , assessment of the problem and corrective action	NA	An alarm is activated if timing is not correct. An assessment of the problem is conducted and corrective actions implemented.	An excursion triggers an assessment of the problem and corrective action	An excursion triggers an assessment of the problem and corrective action and a reporting requirement.

III. PERFORMANCE CRITERIA

Indicator ⇨	Oxidizer Temperature	Bypass interlock	Valve Timing	Work Practice & Inspection	Performance Testing
Data Representativeness	Temperature measuring device will be accurate within 5% of full scale.	NA	Measurement of the valve timing will identify problems.	Inspections of the RTO will identify problems.	A test protocol shall be prepared and approved by EGLE prior to conducting the test.
Verification of Operational Status	Temperatures are recorded on a 7-day paper chart.	NA	PLC monitors valve timing continually.	Inspection records (EAM program)	NA
QA/QC Practices and Criteria	Validation and calibration of temperature system is conducted annually by a 3rd party auditor.	NA	Valve timing is verified during RTO destruction efficiency performance testing.	NA	EPA test methods approved in protocol.
Monitoring Frequency	Continuously	NA	Continually	As required in the O&PM Plan.	As required by EGLE.
Data Collection Procedure	Recorded continually on a paper chart.	NA	NA	Record results of the inspections.	Per approved test method
Recordkeeping	Paper charts are maintained for a period of 5 years.	NA	Malfunctions and corrective actions are recorded in the PM program	Maintain inspection records for a period of 5 year.	Maintain a copy of the test report for 5 years or until another test is conducted.
Reporting	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually.	NA	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually	Malfunctions are reported as required by Rule 912. Deviations are reported semiannually	Submit test protocol and notification of testing to EGLE 30 days prior to test date. Submit test report 60 days after test conducting the test.

IV. JUSTIFICATION

A. Rationale for Selection of Performance Indicators

The oxidizer chamber control temperature was selected because it is indicative of the thermal oxidizer's operation. By maintaining the operating temperature at or above a minimum value, a desired level of control efficiency can be expected to be maintained. If the chamber temperature decreases significantly, complete combustion may not occur. *The combustion chamber is monitored with a single thermocouple which is located in the center top of the chamber.*

It is important to assure the oxidizer is not bypassed during operation of the coating line. The Paint West oxidizer was not provided with a bypass damper. The coating line will not be operated unless the oxidizer is operating properly.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

For regenerative units, the chamber sequencing valves monitored continually by programmable logic controllers (PLC) to be sure that they are properly positioned during each heat recovery heating and cooling cycle. This will avoid the leakage of VOC to the oxidizer stack if the valves are not functioning properly. The design and operation of the chamber sequencing valves timing system will be documented during the performance test and at annual inspections. This will identify changes in operation that might impact control efficiency. *The valves are driven by hydraulic actuators which are controlled by a PLC. The valves are actuated every four (4) minutes to change from one tower to the other.*

An emissions performance test on the oxidizer is conducted as required by the MDEQ to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

B. Rationale for Selection of Indicator Ranges

The selected indicator range for the oxidizer chamber control temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the oxidizer is established at the operating temperature maintained during a performance test. The thermal oxidation system includes a temperature controller that maintains the desired combustion chamber temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

C. Performance Test

A periodic performance test will be conducted on or before November 2, 2022 to determine the destruction efficiency of the RTO as required by the ROP.

EGLE

RENEWABLE OPERATING PERMIT
RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
N2079	3714	336390	MI-ROP-N2079-2017	1

Source Name: Lacks Enterprises, Inc.

Street Address: 4375 52nd Street

City	State	ZIP Code	County
Kentwood	MI	49512	Kent

Section/Town/Range (if address not available)

Source Description: Surface coating of plastic automotive parts

☐ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
Lacks Enterprises, Inc.	1

Mailing address (☐ check if same as source address): 5460 Cascade Road

City	State	ZIP Code	County	Country
Grand Rapids	MI	49546	Kent	USA

☐ Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

SRN: N2079	Section Number (if applicable): 1

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name	Title			
Karen Baweja	Environmental Manager			
Company Name & Mailing address (☐ check if same as source address)				
Lacks Enterprises Plastic Plate Kraft 5675 Kraft Ave. SE				
City	State	ZIP Code	County	Country
Grand Rapids	MI	49512	Kent	USA
Phone number	E-mail address			
616-956-7259	k.baweja@lacksenterprises.com			

Contact 2 Name (optional)	Title			
Ken Bailey	Director of EHS & Protective Services			
Company Name & Mailing address (☐ check if same as source address)				
Lacks Enterprises 4949 Broadmoor Ave. SE				
City	State	ZIP Code	County	Country
Kentwood	MI	49512	Kent	USA
Phone number	E-mail address			
616-554-2307	k.bailey@lacksenterprises.com			

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name	Title			
Joe Voss	Plant Manager			
Company Name & Mailing address (☐ check if same as source address)				
Lacks Enterprises Paint Central 4315 52nd St. SE				
City	State	ZIP Code	County	Country
Kentwood	MI	49512	Kent	USA
Phone number	E-mail address			
616-554-7501	j.voss@lackstrim.com			

Responsible Official 2 Name (optional)	Title			
Bob Bieri	VP & GM, Lacks Trim Systems			
Company Name & Mailing address (☐ check if same as source address)				
Lacks Enterprises 5460 Cascade Rd SE				
City	State	ZIP Code	County	Country
Grand Rapids	MI	49546	Kent	USA
Phone number	E-mail address			
616-554-7860	b.bieri@lackstrim.com			

☐ Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

SRN: N2079	Section Number (if applicable): 1

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.	
☒ Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	☐ Compliance Plan/Schedule of Compliance
☒ Mark-up copy of existing ROP using official version from the AQD website (required)	☐ Stack information
☒ Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	☐ Acid Rain Permit Initial/Renewal Application
☐ Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	☐ Cross-State Air Pollution Rule (CSAPR) Information
☐ MAERS Forms (to report emissions not previously submitted)	☐ Confidential Information
☐ Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	☒ Paper copy of all documentation provided (required)
☒ Compliance Assurance Monitoring (CAM) Plan	☒ Electronic documents provided (optional)
☒ Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	☐ Other, explain:

Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	☒ Yes ☐ No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

Name and Title of the Responsible Official (Print or Type)

Joe Voss, Plant Manager

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

Joseph Voss — **Signature of Responsible Official**

4-15-22 — **Date**

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☐ Yes ☒ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68)	☐ Yes ☒ No
	If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions?	☒ Yes ☐ No
	If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form.	PTI 110-18A
	If No, criteria pollutant potential emission calculations do not need to be included.	
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act?	☒ Yes ☐ No
	If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations.	PTI 110-18A
	If No, HAP potential emission calculations do not need to be included.	
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form.	☐ Yes ☒ No
	Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)?	☒ Yes ☐ No
	If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy.	
	Is a CAM plan included with this application?	☒ Yes ☐ No
	If a CAM Plan is included, check the type of proposed monitoring included in the Plan:	
	1. Monitoring proposed by the source based on performance of the control device, or	☒
	2. Presumptively Acceptable Monitoring, if eligible	☐
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement?	☒ Yes ☐ No
	If Yes, then a copy must be submitted as part of the ROP renewal application.	
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable?	☐ Yes ☒ No
	If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	
☒	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-CAMPLAN**	

SRN: N2079	Section Number (if applicable): 1

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☒ Yes ☐ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]
EUAIRMAKEUP	Facility air make-up units, space heaters, and water heaters	Rule 212(4)(c)	Rule 282(b)(i)

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: **AI-**

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☒ Yes ☐ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☒ Yes ☐ No

Comments:
EUWESTMANUAL5, EUWESTMANUAL6, EUWESTMANUAL7, EUWESTMANUAL8, EUWESTMANUAL9 were dismantled in March, 2020.

☐ Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: **AI-**

SRN: N2079	Section Number (if applicable): 1

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. If No, go to Part G. ☒ Yes ☐ No

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed
110-18A	EUSPINELLE, FGCENTRALPAINT	Pretreatment system for washing parts prior to coating. Series of spray cleaning and wash stages and an anodic etch dip tank exhausted to a chrome composite mesh pad scrubber.	11/4/2019
110-18A	EUCENTRALPAINT FGCENTRALPAINT	Automatic paint system including primer booth, basecoat booth, clearcoat booth, and one natural gas oven.VOC emissions captured using a permanent total enclosure and abated via an RTO. A water curtain system is used to control particulate matter in the booths.	11/4/2019
110-18A	EUSOLRECLAIM FGCENTRALPAINT	Solvent reclamation system.	September 2021

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. ☐ Yes ☒ No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. ☒ Yes ☐ No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identity the stack(s) that were not reported on the applicable MAERS form(s). ☐ Yes ☒ No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. ☐ Yes ☒ No

Comments:

☒ Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**110-18A

SRN: N2079	Section Number (if applicable): 1

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.

If Yes, identify the emission units in the table below. If No, go to Part H. ☒ Yes ☐ No

Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	**Emission Unit Description – *Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices***	**Date Emission Unit was Installed/ Modified/ Reconstructed**
☐ Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
☒ Rule 287(2)(c) surface coating line	EUTEACHBOOTH – one automatic dry filter sample booth which is used on a limited basis to test coatings on parts at the Paint Central facility.	11/4/2019
☐ Rule 290 process with limited emissions		

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: **AI-**

SRN: N2079	Section Number (if applicable): 1

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If Yes, answer the questions below.	☐ Yes ☒ No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If Yes, describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	☐ Yes ☒ No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If Yes, identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	☐ Yes ☒ No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If Yes, on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify each state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	☐ Yes ☒ No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If Yes, list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	☐ Yes ☒ No
H6. Does the source propose to add, change and/or delete **source-wide** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H7. Are you proposing to **streamline** any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	☐ Yes ☒ No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
☐ Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-**	

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: N2079	Section Number (if applicable): 1

1. Additional Information ID
AI-CAMPLAN

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Regenerative thermal oxidizers (3) for surface coating processes (solvent based paint) FGEASTPAINT, FGWESTROBOPAINT, EUCENTRALPAINT.

3 CAM Plans are included with this application.

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: N2079	Section Number (if applicable): 1

1. Additional Information ID
AI-110-18A

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Permit to install 110-18A for EUSPINELLE, EUCENTRALPAINT, & EUSOLRECLAIM (all included in FGCENTRALPAINT) is included with this application.

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN:	Section Number (if applicable):

1. Additional Information ID
AI-

Additional Information

2. Is This Information Confidential? ☐ Yes ☐ No

LACKS – BARDEN PLATER - ENVIRONMENTAL
MALFUCNTION ABATEMENT / OPERATION & MAINTENANCE (O&M) PLAN

For

LACKS Enterprises, Inc.

BARDEN PLATER

4090 Barden Street

Kentwood, Michigan

Michigan SRN # N2079

Permit No. MI-ROP-N2079-2012

Revised: 6/6/2019

Revised: 1/10/2020

Revised: 9/1/2021

Revised: April 8, 2022

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Facility Wide

Maintenance records will consist primarily of the computer based MP2 preventive maintenance system. Additional maintenance records may include PM Work Orders, Maintenance Work Requests, checklists, purchase orders, and other documents which describe the maintenance tasks and corrective actions. All records will be maintained for a minimum of five (5) years.

All **Malfunction Alarms** will be activated immediately within the building and will consist of both audible and visual alarms and will be recorded by the automated system. The alarm will also appear in the plating laboratory on a system monitor.

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Opacity	Non-certified visual observation	Once each week during operation	Other than uncombined water vapor, there must be no visible emission (0% opacity) from a stack.	Record the following observations for each stack: date, time, visible emissions observed (yes/no).
Condition of the automated alarm system	Test each alarm for proper operation	Each quarter	The sensor sends an alarm signal and the alarm is recorded.	The test results and corrective actions will be recorded in Preventive Maintenance (PM) program.

Malfunction Corrective Actions:

If visible emissions are observed, notify the plating supervisor to initiate immediate shut down of the affected process and begin an inspection of the system. Prepare a Maintenance Work Request (MWR) to perform a determination of the cause of the visible emissions and initiate the necessary corrective actions. Record the date, time, duration of the malfunction, who was notified and the corrective actions on the MWR.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager and/or Plater Supervisor who in turn will report the malfunction to the Plant Manager and the Protective Services Central Dispatch at 554-7180.

2.) The Environmental Coordinator, or designate, will make the required notifications to the MDEQ in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager

Chrome Etch Tanks and Chrome Plate Tanks – Composite Mesh Pad Scrubbers and Surface Tension

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Pressure drop across the CMP system	Continuous pressure drop monitoring device	Continuously during operation	**Cr Etch**: 1.21 – 5.21" Water Gauge Evaporator: 0.5 – 4.5" WG **Cr Plate**: 3.45 – 7.45" WG Evaporator: 0.25 – 4.25" WG	1.) Alarms will be recorded by the automated system. 2.) Daily pressure drop readings will be recorded by lab personnel.
Chrome Etch Wash down water flow rate, frequency and duration to each pad.	Flow meter (GPM)	During pad wash down	25 GPM minimum wash rate **Pad #1:** each hour for a minimum of 1 minute **Pad #2:** each day for a minimum of 1 minute **Pad#3:** each week manually until clear	Alarms for low flow will be recorded by the automated monitoring system.
Chrome Plate Wash down water flow rate to each pad.	Flow meter (GPM)	During pad wash down	25 GPM minimum wash rate **Pad #1:** each hour for a minimum of 1 minute **Pad #2:** each day for a minimum of 1 minute **Pad#3:** each week manually until clear	Alarms for low flow will be recorded by the automated monitoring system.
Confirmation of pad wash down	Visual	Once per quarter	Flow to the wash down water collection tank	Maintenance records
Condition of CMP system	Visual inspection	Once per quarter	Proper drainage, no chromic acid build-up on the pads or gaps allowing bypass, no evidence of chemical attack on the structural integrity.	Maintenance records
Condition of the back portion of the mesh pad closest to the fan.	Visual inspection	Once per quarter	No breakthrough of chromic acid mist	Maintenance records
Ductwork from tanks to the scrubber	Visual inspection	Once per quarter	No leaks, cracks or gaps	Maintenance records

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Condition of pads	Visual inspection performed under the supervision of the Plant Engineer – Plating Operation or designate.	Annual	Remove top covers – inspect for gaps around the pads which would allow air to bypass.	Composite Mesh Pad Scrubber System – Annual PM's checklist.
Chrome etch tanks surface tension	Tensiometer	Each day of operation	Less than 45 dynes/cm	Surface tension results will be recorded each day by lab personnel.
Chrome plate tanks surface tension	Tensiometer	Each day of operation	Less than 45 dynes/cm	Surface tension results will be recorded each day by lab personnel.

Malfunction Corrective Actions:

1.) Notify the plating supervisor to initiate immediate shut down of the affected process and begin an inspection of the system. Cease operating until normal operation of the scrubber is restored.
2.) Prepare a Maintenance Work Request (MWR) to perform a determination of the cause of the malfunction and initiate the necessary corrective actions. Record the date, time, duration of the malfunction, who was notified and the corrective actions on the MWR.
3.) If applicable, modify the MAP to incorporate the actions taken to correct and to prevent a reoccurrence of the malfunction.

Additional Requirements:

Each quarterly inspection report will include a description of the working condition of the scrubber, any observed problems, corrective actions and will be reviewed by the inspector's supervisor as evidenced by the supervisor's name and review date.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager and/or Plater Supervisor who in turn will report the malfunction to the Plant Manager and the Protective Services Central Dispatch at 554-7180.
2.) The Environmental Coordinator, or designate, will make the required notifications to the MDEQ in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager

Electroless Copper Tanks and Strip Tanks Packed Bed Scrubbers

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Pressure drop across the packed bed	Continuous pressure drop monitoring device	Continuously during operation	Recommended pressure drop range ("Water Gauge) EC copper : 0.1"-3" WG Strip : 1.5"-4" WG	1.) Alarms will be recorded by the automated system. 2.) Daily pressure drop readings will be recorded by lab personnel.
Water flow to the packed bed (circulating rate)	Continuous flow meter (GPM).	Continuously during operation	Scrubber minimum flow rate EC copper: 150 GPM Strip: 150 GPM	Alarms for low flow will be recorded by an automated system.
Water bleed-off rate	Continuous flow meter (GPM).	Continuously during operation	Bleed-off minimum flow rate EC copper: 2 GPM Strip: 2.7 GPM	Alarms for low flow will be recorded by an automated system.
Condition of packed bed	Visual inspection	Once per quarter	Proper drainage, no build-up on beds, no evidence of chemical attack on the structural integrity.	Maintenance records
Condition of back portion of the mist eliminator	Visual inspection	Once per quarter	Dry and no evidence of breakthrough.	Maintenance records
Ductwork from tanks to the scrubber	Visual inspection	Once per quarter	No leaks, cracks or gaps	Maintenance records

Malfunction Corrective Actions:

1.) Notify the plating supervisor to initiate immediate shut down of the affected process and begin an inspection of the system. Cease operating until normal operation of the scrubber is restored.
2.) Prepare a Maintenance Work Request (MWR) to perform a determination of the cause of the visible emissions and initiate the necessary corrective actions. Record the date, time, duration of the malfunction, who was notified and the corrective actions on the MWR.
3.) If applicable, modify the MAP to incorporate the actions taken to correct and to prevent a reoccurrence of the malfunction.

Additional Requirements:

Each quarterly inspection report will include a description of the working condition of the scrubber, any observed problems, corrective actions and will be reviewed by the inspector's supervisor as evidenced by the supervisor's name and review date.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager and/or Plater Supervisor who in turn will report the malfunction to the Plant Manager and the Protective Services Central Dispatch at 554-7180.
2.) The Environmental Coordinator, or designate, will make the required notifications to the MDEQ in accordance with the applicable rules and permit requirements.

Primary Responsibility: Maintenance Manager

Pre Etch, Neutralizer, Catalyst, Accelerator, Copper Plating, and Nickel Plating Tanks Fan and Ventilation Systems

Operating Variable	Monitoring Method	Monitoring Frequency	Normal Operating Range	Recordkeeping Requirements
Fan operation	Electrical current draw	Continuous – automated monitoring system	Electrical current draw when the plater is in operation.	Alarms for loss of electrical current draw will be recorded by an automated system.
Condition of the ductwork, fans, motors, belts, support structures and stacks.	Visual inspection	Once per quarter	No leaks, cracks, gaps in the ductwork and stacks or operating problems with the fans and motors.	Maintenance records

Malfunction Corrective Actions:

If problems are observed, notify the plating supervisor to initiate an inspection of the system. Prepare a Maintenance Work Request (MWR) to perform a determination of the cause of the malfunction and initiate the necessary corrective actions. Record the date, time, duration of the malfunction, who was notified and the corrective actions on the MWR.

Malfunction Reporting Requirements:

1.) All malfunctions will be reported immediately to the Maintenance Manager and/or Plater Supervisor.

2.) The Environmental Coordinator, or designate, will make the required notifications to the MDEQ in accordance with the applicable rules and permit requirements.

Primary Responsibility:

Maintenance Manager