

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

EFFECTIVE DATE: July 9, 2020

ISSUED TO

**Nylok LLC**

State Registration Number (SRN): N5656

LOCATED AT

15260 Hallmark Drive, Macomb, Macomb County, Michigan 48042

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-N5656-2020

Expiration Date: July 9, 2025

Administratively Complete ROP Renewal Application  
Due Between January 9, 2024 and January 9, 2025

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

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-N5656-2020

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

Michigan Department of Environment, Great Lakes, and Energy

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Joyce Zhu, Warren District Supervisor

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## AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

## A. GENERAL CONDITIONS

### Permit Enforceability

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

### General Provisions

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

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

## Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).<sup>2</sup> **(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:"<sup>2</sup> **(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.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(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).<sup>2</sup> **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

## Monitoring/Recordkeeping

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

## Certification & Reporting

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

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
- 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.
  - 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.<sup>2</sup> **(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))**
- The applicable requirements are included and are specifically identified in the ROP.
  - 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:
- 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))**
  - 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))**
  - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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

## Revisions

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

## Reopenings

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

## Renewals

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

## Stratospheric Ozone Protection

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

## Risk Management Plan

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

## Emission Trading

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

### **Permit to Install (PTI)**

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<sup>2</sup> **(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.<sup>2</sup> **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.<sup>2</sup> **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> **(R 336.1201(4))**

#### **Footnotes:**

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

<sup>2</sup>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.

### 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
EU-MIXING	Mixing operation for producing a toluene-based adhesive. This mixing operation is located in a room having a 450 kilogram (kg) stainless steel mixing vat with mixing paddle and 55 gallon drum(s) with mixing paddle and its own cover (in order for the "binder" to be blended while being covered). The finished product is repackaged into 25-liter pails.	11-10-11	NA
EU-PR1	Gravity fed adhesive coating line.	08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-PR2	Gravity fed adhesive coating line.	10-18-19	FG-COATINGLINEA, FG-MACT MMMM
EU-PR4	Gravity fed adhesive coating line.	10-11-19	FG-COATINGLINEA, FG-MACT MMMM
EU-PR5	Gravity fed adhesive coating line.	07-13-93 08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-PR6	Gravity fed adhesive coating line.	07-13-93 08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-PR7	Gravity fed adhesive coating line.	07-13-93 08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-PR8	Gravity fed adhesive coating line.	11-01-05 08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-PR9	Gravity fed adhesive coating line.	07-29-05 08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-PR10	Gravity fed adhesive coating line.	12-01-08 08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-PRB1	Gravity fed adhesive coating line.	12-01-08 08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-PRN3	Internally threaded nut machines, intermittent air driven; material drops onto thread of parts.	07-13-93 08-15-17	FG-COATINGLINEA, FG-MACT MMMM
EU-NTQ1	Flow coat process line. NyTorq-IPA 5-10%.	08-01-05 08-15-17	FG-COATINGLINEB, FG-MACT MMMM
EU-PB3	Flow coat coating line. NyTorq Process.	02-01-04 08-15-17	FG-COATINGLINEB, FG-MACT MMMM
EU-WN3	Part-time flow coat machine for NyTorq Process.	04-01-10 08-15-17	FG-COATINGLINEB, FG-MACT MMMM

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-WN9	NyTorq Process coating line. Two step system that uses NyPlate (powder) and NyTorq (contains 5-10% IPA).	06-01-13 08-15-17	FG-COATINGLINEB, FG-MACT MMMM
EU-HDN1	Patch + NyTorq. Powder-Flow. High Definition Nut machine.	03-01-11 08-15-17	FG-COATINGLINEB, FG-MACT MMMM

**EU-MIXING  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Mixing operation for producing a toluene-based adhesive. This mixing operation is located in a room having a 450 kilogram (kg) stainless steel mixing vat with mixing paddle and 55 gallon drum(s) with mixing paddle and its own cover (in order for the “binder” to be blended while being covered). The finished product is repackaged into 25-liter pails.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	2.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUMIXING	SC VI.2 SC VI.3	R 336.1702(a)

**II. MATERIAL LIMIT(S)**

NA

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

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain the 55-gallon binder drum(s) with a cover during mixing/blending operation(s).<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901, R 336.1910)
2. The permittee shall equip and maintain the mixing vat with a cover during mixing/blending operation(s).<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901, R 336.1910)

**V. TESTING/SAMPLING**

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

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 complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205(3))

2. The permittee shall keep the following information on a monthly basis for EUMIXING:
  - a. Gallons or pounds of each VOC containing material used.
  - b. Where applicable, gallons or pounds of each VOC containing material reclaimed.
  - c. VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
  - d. VOC emission calculations determining the emission rate of VOC in tons per year as determined at the end of each calendar month. These VOC calculations shall be determined by using an emission factor of two percent (2%) VOC emitted during binder formulation, or an equivalent method acceptable to the AQD District Supervisor.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request.<sup>2</sup> (R 336.1205(3), R 336.1702(a))

3. The permittee shall record, in a satisfactory manner, the number of batches produced per day (per type of precote produced) on a monthly basis. The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request.<sup>2</sup> (R 336.1702(a))

**VII. REPORTING**

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

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-03	16 <sup>1</sup>	35 <sup>1</sup>	R 336.1225

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

<sup>2</sup>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
FG-COATINGLINEA	Eleven coating lines, including purge and cleanup solvents, located within a permanent total enclosure (PTE) and controlled by a regenerative thermal oxidizer (RTO), which apply specialty adhesives and coatings to metal fasteners.	EU-PR1, EU-PR2, EU-PR4, EU-PR5, EU-PR6, EU-PR7, EU-PR8, EU-PR9, EU-PR10, EU-PRB1, EU-PRN3
FG-COATINGLINEB	Five coating lines, including purge and cleanup solvents, which apply specialty adhesives and coatings to metal fasteners.	EU-NTQ1, EU-PB3, EU-WN3, EU-WN9, EU-HDN1
FG-MACT MMMM	Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR Part 63, Subpart MMMM, 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. 40 CFR Part 63, Subpart MMMM does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).	EU-PR1, EU-PR2, EU-PR4, EU-PR5, EU-PR6, EU-PR7, EU-PR8, EU-PR9, EU-PR10, EU-PRB1, EU-PRN3, EU-NTQ1, EU-PB3, EU-WN3, EU-WN9, EU-HDN1

**FG-COATINGLINEA  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Eleven coating lines, including purge and cleanup solvents, located within a permanent total enclosure (PTE) and controlled by a regenerative thermal oxidizer (RTO), which apply specialty adhesives and coatings to metal fasteners.

**Emission Units:** EU-PR1, EU-PR2, EU-PR4, EU-PR5, EU-PR6, EU-PR7, EU-PR8, EU-PR9, EU-PR10, EU-PRB1, EU-PRN3

**POLLUTION CONTROL EQUIPMENT**

Permanent Total Enclosure (PTE), Regenerative Thermal Oxidizer (RTO)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	5.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FG-COATINGLINEA	SC V.1 SC V.2 SC V.3 SC VI.5 SC VI.6	<b>R 336.1225, R 336.1702(a)</b>

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.<sup>2</sup> **(R 336.1225, R 336.1702(a))**
2. The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.<sup>2</sup> **(R 336.1225, R 336.1702(a))**
3. The permittee shall maintain a minimum of 0.007 inches of water pressure differential between the PTE and the adjacent area on a continuous basis.<sup>2</sup> **(R 336.1702, R 336.1910, 40 CFR 64.3(c)(1)(i))**
4. The permittee shall operate and maintain FG-COATINGLINEA in accordance with the permittee’s current Startup, Shutdown, and Malfunction Plan/Work Practice Plan for the RTO, PTE and associated controlled coating lines to ensure proper operation.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) and (d))**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate FG-COATINGLINEA, including all purge and cleanup operations, unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes maintaining a minimum VOC destruction efficiency of 95 percent (by weight), a minimum combustion chamber temperature of 1,550°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1,550°F based upon a three-hour rolling average.<sup>2</sup> **(R 336.1225, R 336.1702, R 336.1902, R 336.1910, 40 CFR 64.6(c)(1)(i) & (iii))**

2. 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 FG-COATINGLINEA.<sup>2</sup> **(R 336.1702, R 336.1910, 40 CFR 64.6(c)(1)(ii))**
3. The permittee shall not operate FG-COATINGLINEA unless the PTE is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the PTE includes a capture efficiency of 100 percent (by weight), and operation at a pressure lower than all adjacent areas so that air flows into the PTE through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed.<sup>2</sup> **(R 336.1225, R 336.1702, R 336.1910)**
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to continuously monitor and record the pressure differential between the PTE for FG-COATINGLINEA and the outside area to verify that air is entering the PTE.<sup>2</sup> **(R 336.1702, R 336.1910, 40 CFR 64.6(c)(1)(ii))**

#### **V. TESTING/SAMPLING**

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

1. The permittee shall determine the VOC content, water content, and density of any coating 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.<sup>2</sup> **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. Upon request of the AQD District Supervisor, the permittee shall verify the VOC destruction efficiency of the existing RTO, by testing at owner's expense, in accordance with Department requirements. 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.<sup>2</sup> **(R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)**
3. Upon request of the AQD District Supervisor, 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. 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.<sup>2</sup> **(R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)**

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(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.<sup>2</sup> **(R 336.1225, R 336.1702)**
2. The permittee shall monitor, in a satisfactory manner, the temperature in the combustion chamber of the RTO on a continuous basis, during operation of FG-COATINGLINEA. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 64.6(c)(1)(i) and (ii))**
3. The permittee shall calibrate and maintain the temperature monitoring device as follows: **40 CFR 64.6(c)(1)(iii)**

- a. Use a temperature sensor with a measurement sensitivity of five degrees Fahrenheit or 1.0 percent of the temperature value, whichever is larger.
  - b. When relocating or replacing the sensor, perform a validation check by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature.
  - c. Conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices.
  - d. Conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used.
4. For each control device in operation where a bypass can occur based on the design of FG-COATINGLINEA and associated capture and control equipment, the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was opened and the length of time the bypass line was opened shall be kept on file. **(40 CFR 64.3(a)(2))**
5. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and purge/clean-up 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. The permittee shall keep all records and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702(a))**
6. The permittee shall keep the following information on a monthly basis for FG-COATINGLINEA:
- a. Gallons of each coating, reducer and purge/clean-up solvent used and reclaimed.
  - b. VOC content, in pounds per gallon, of each coating, reducer and purge/clean-up solvent used.
  - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month for the flexible group.
  - 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 for the flexible group.

The permittee shall keep the records using 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.<sup>2</sup> **(R 336.1225, R 336.1702(a))**

7. The permittee shall monitor and record, in a satisfactory manner, the pressure differential between the PTE for FG-COATINGLINEA and the outside area on a continuous basis to verify that air is entering the PTE. The permittee shall keep records of the pressure differential between the PTE and the adjacent area. The permittee shall operate and maintain the PTE and pressure differential monitoring device in accordance with the permittee's current Startup, Shutdown, and Malfunction Plan/Work Practice Plan for the RTO, PTE and associated controlled coating lines to ensure proper operation of the PTE and monitoring device. The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702, R 338.1910, 40 CFR 64.3(a)(2))**
8. The permittee shall calibrate and maintain the pressure drop monitoring device as follows: **40 CFR 64.6(c)(1)(iii)**
- a. Conduct a validation check upon relocation or replacement of a sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.
  - b. Conduct accuracy audits every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.
  - c. Perform monthly leak checks on pressure connections. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds.
  - d. Perform a visual inspection of the sensor at least monthly if there is no redundant sensor.
9. The permittee shall develop, maintain, and implement a CAM Plan for FG-COATINGLINEA. The CAM Plan shall be updated as necessary to reflect changes in monitoring, to implement corrective actions and to address malfunctions. Changes to the CAM Plan shall be submitted to the District Supervisor for review and approval. All

records and activities associated with the CAM Plan shall be kept on file for a period of at least five years and made available to the Department upon request. **(40 CFR 64.4(a))**

10. For the purposes of Compliance Assurance Monitoring (CAM), an excursion is defined as:
  - a. The RTO three-hour rolling time period average temperature less than the greater of 1550°F or the minimum thermal oxidizer combustion chamber temperature determined during the most recent RTO performance test which demonstrated compliance with the minimum of 95 percent destruction efficiency based upon a three-hour average and a minimum retention time of 0.5 seconds
  - b. The PTE differential pressure gauge reading is greater than negative 0.007 inches of water. **(40 CFR 64.6(c)(2))**
11. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (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, which include following the procedures contained in the SSMP/WPP for identifying and correcting malfunctions or failure events, 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). **(40 CFR 64.7(d))**
12. 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 emissions 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 64.7(c))**
13. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
14. 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))**
15. The permittee shall keep records on file of all inspections, maintenance activities, malfunctions, and repairs on the RTO and PTE. The record shall be kept in a format acceptable to the AQD District Supervisor and shall be made available to the Department upon request. **(R 336.1910)**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

5. 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))**
6. 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

### **VIII. STACK/VENT RESTRICTION(S)**

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

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/ Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-RTO	34 <sup>2</sup>	32 <sup>2</sup>	<b>R 336.1225 40 CFR 52.21(c) &amp; (d)</b>

### **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 63, Subparts A and M MMM as they apply to FG-COATINGLINEA.<sup>2</sup> **(40 CFR 63, Subparts A and M MMM)**
2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**
3. 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 ROP and 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))**

#### **Footnotes:**

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

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

**FG-COATINGLINEB  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Five coating lines, including purge and cleanup solvents, which apply specialty adhesives and coatings to metal fasteners.

**Emission Units:** EU-NTQ1, EU-PB3, EU-WN3, EU-WN9, EU-HDN1

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	2,000 lb/month <sup>2</sup>	Calendar month	Each coating line in FG-COATINGLINEB and all associated purge and clean-up materials	SC V.1 SC VI.2 SC VI.3	<b>R 336.1225 R 336.1702(d)</b>
2. VOC	10.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Each coating line in FG-COATINGLINEB and all associated purge and clean-up materials	SC V.1 SC VI.2 SC VI.3	<b>R 336.1225, R 336.1702(d)</b>
3. VOC	30.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FG-COATINGLINEB	SC V.1 SC VI.2 SC VI.3	<b>R 336.1225, R 336.1702(d)</b>

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.<sup>2</sup> (R 336.1225, R 336.1702(d))
2. The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(d))

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

## **V. TESTING/SAMPLING**

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

1. The permittee shall determine the 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.<sup>2</sup> **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

## **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall 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.<sup>2</sup> **(R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and purge/clean-up 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. The permittee shall keep all records and make them available to the Department upon request.<sup>2</sup> **(R 336.1225, R 336.1702(d))**
3. The permittee shall keep the following information on a monthly basis for FGCOATINGLINEB:
  - a. Gallons of each coating, reducer and purge/clean-up solvent used and reclaimed in each coating line.
  - b. VOC content, in pounds per gallon, of each coating, reducer and purge/clean-up solvent used in each coating line.
  - c. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month and tons per calendar month for each coating line.
  - 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 for each coating line and all coating lines combined.

The permittee shall keep the records using 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.<sup>2</sup> **(R 336.1225, R 336.1702(d))**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

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

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/ Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-01	8 <sup>2</sup>	33 <sup>2</sup>	<b>R 336.1225, 40 CFR 52.21(c) &amp; (d)</b>
2. SV-02	8 <sup>2</sup>	33 <sup>2</sup>	<b>R 336.1225, 40 CFR 52.21(c) &amp; (d)</b>

**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 63, Subparts A and M MMM as they apply to FG-COATINGLINEB.<sup>2</sup> **(40 CFR 63, Subparts A and M MMM)**

**Footnotes:**

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

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

**FG-MACT MMMM  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR Part 63, Subpart MMMM, 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. 40 CFR Part 63, Subpart MMMM does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).

**Emission Units:** EU-PR1, EU-PR2, EU-PR4, EU-PR5, EU-PR6, EU-PR7, EU-PR8, EU-PR9, EU-PR10, EU-PRB1, EU-PRN3, EU-NTQ1, EU-PB3, EU-WN3, EU-WN9, EU-HDN1

**POLLUTION CONTROL EQUIPMENT**

Permanent Total Enclosure (PTE) and Regenerative Thermal Oxidizer (RTO) for Emission Units in FG-COATINGLINEA,

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Organic HAP	2.6 lbs per gal of coating solids used <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Existing – General Use Coating	SC V.1 SC V.2 SC VI.1 through SC VI.10	<b>40 CFR 63.3890(b)(1)</b>

2. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(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.<sup>2</sup> **(40 CFR 63.3891)**

3. 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 63.3890 at all times.<sup>2</sup> **(40 CFR 63.3900(a)(1))**
4. 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.<sup>2</sup> **(40 CFR 63.3900(a)(2)(i))**
5. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.3890(a) or (b), the permittee may comply separately with each subcategory emission limit, or comply using one of the alternatives in 40 CFR 63.3890(c)(1) or (2).<sup>2</sup> **(40 CFR 63.3890(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 <sup>2*</sup>	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1 SC VI.2 SC VI.3 SC VI.5	<b>40 CFR 63.3891(a)</b>
2. Each Cleaning Material	No Organic HAP <sup>2*</sup>	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1 SC VI.2 SC VI.3 SC VI.5	<b>40 CFR 63.3891(a)</b>

\* Determined according to 40 CFR 63.3941(a).

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

- 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 M as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3967.<sup>2</sup> **(40 CFR 63.3892(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 63.3967(a).
Emission capture system that is a PTE according to 40 CFR 63.3965(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 inches of water (H <sub>2</sub> O), as established in Method 204 of Appendix M of 40 CFR 51.

- 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 specify practices and procedures to ensure at a minimum the following elements are implemented:
  - All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.<sup>2</sup> **(40 CFR 63.3893(b)(1))**
  - Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.<sup>2</sup> **(40 CFR 63.3893(b)(2))**
  - 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.<sup>2</sup> **(40 CFR 63.3893(b)(3))**
  - Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.<sup>2</sup> **(40 CFR 63.3893(b)(4))**
  - Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.<sup>2</sup> **(40 CFR 63.3893(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).<sup>2</sup> **(40 CFR 63.3893(c))**

- 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.<sup>2</sup> **(40 CFR 63.3900(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 63.3892 at all times except during periods of startup, shutdown, and malfunction.<sup>2</sup> **(40 CFR 63.3900(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 63.3893 at all times.<sup>2</sup> **(40 CFR 63.3900(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 FG-MACT MMMM unless the RTO is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> **(40 CFR 63.3892(b))**

#### **V. TESTING/SAMPLING**

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

1. 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 63.3960 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.3964(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h).<sup>2</sup> **(40 CFR 63.3964(a))**
2. The permittee shall conduct each performance test of an emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.3965 and 40 CFR 63.3966.<sup>2</sup> **(40 CFR 63.3964(b))**

#### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall conduct compliance demonstrations according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961.<sup>2</sup> **(40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960)**
2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931.<sup>2</sup> **(40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(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 Subpart MMMM, and the documentation supporting each notification and report.<sup>2</sup> **(40 CFR 63.3930(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 volume fraction of coating solids for each coating.<sup>2</sup> **(40 CFR 63.3930(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.<sup>2</sup> **(40 CFR 63.3930(c)(1))**
  - d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941.<sup>2</sup> **(40 CFR 63.3930(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 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951.<sup>2</sup> **(40 CFR 63.3930(c)(3))**
  - f. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.3930(c)(4)(i) through (v).<sup>2</sup> **(40 CFR 63.3930(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 volume used.<sup>2</sup> **(40 CFR 63.3930(d))**
  - h. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight.<sup>2</sup> **(40 CFR 63.3930(e) )**
  - i. The volume fraction of coating solids for each coating used during each compliance period.<sup>2</sup> **(40 CFR 63.3930(f))**
  - j. For either the emission rate without add-on controls or with add-on controls option, the density of for each coating, thinner and/or other additive, and cleaning material used during each compliance period.<sup>2</sup> **(40 CFR 63.3930(g))**
  - k. The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 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 63.3951(e)(4).<sup>2</sup> **(40 CFR 63.3930(h))**
  - l. The date, time, and duration of each deviation.<sup>2</sup> **(40 CFR 63.3930(j))**
  - m. For the emission rate with add-on controls option, records specified in 40 CFR 63.3930(k)(1) through 40 CFR 63.3930(k)(8).<sup>2</sup> **(40 CFR 63.3930(k))**
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 of 40 CFR Part 63, Subpart Mmmm using the applicable method(s) described below:<sup>2</sup> **(40 CFR 63.3963(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 63.3967(a).	i. Collect the combustion temperature data according to 40 CFR 63.3968(c) ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
Emission capture system that is a PTE according to 40 CFR 63.3965(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 inches of H <sub>2</sub> O, as established in Method 204 of Appendix M of 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 63.3968(g)(1) or the pressure drop across the enclosure according to 40 CFR 63.3968(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.

- 5. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.3890, for each compliance period, using Equation 2 of 40 CFR 63.3941. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.3941(a).<sup>2</sup> **(40 CFR 63.3942)**
- 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 63.3890, for each compliance period, according to 40 CFR 63.3951(a) through (g).<sup>2</sup> **(40 CFR 63.3952)**
- 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 in 40 CFR 63.3890, for each compliance period, according to the procedures in 40 CFR 63.3961.<sup>2</sup> **(40 CFR 63.3963)**

8. During the performance test required by 40 CFR 63.3960, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.3967 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.3892.<sup>2</sup> **(40 CFR 63.3967)**
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 63.3968(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.3968(b).<sup>2</sup> **(40 CFR 63.3968)**
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 M, or to monitor an alternative parameter and comply with a different operating limit.<sup>2</sup> **(40 CFR 63.3892(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, if any coating used for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890; or any thinner or cleaning material used contains any organic HAP, the permittee shall report this as a deviation as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(5).<sup>2</sup> **(40 CFR 63.3942(b))**
5. For the emission rate without add-on controls, if the organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890, the permittee shall report this as a deviation as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(6).<sup>2</sup> **(40 CFR 63.3952(b))**
6. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7):
  - a. The organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890;<sup>2</sup> **(40 CFR 63.3963(b))**
  - b. An operating parameter is out of the allowed range;<sup>2</sup> **(40 CFR 63.3963(c)(1))**
  - c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened;<sup>2</sup> **(40 CFR 63.3963(d))**
  - d. Deviations from work practice standards occur.<sup>2</sup> **(40 CFR 63.3963(e))**
7. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), as specified in 40 CFR 63.3910.<sup>2</sup> **(40 CFR Part 63, Subparts A and M)**
8. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance.<sup>2</sup> **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(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.<sup>2</sup> **(40 CFR 63.3920(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 63.3920(c).<sup>2</sup> **(40 CFR 63.3920(c), 40 CFR 63.10(d))**

**See Appendix 8**

**VIII. STACK/VENT RESTRICTION(S)**

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

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart M for Surface Coating of Miscellaneous Metal Parts and Products.<sup>2</sup> **(40 CFR Part 63, Subparts A and M)**

**Footnotes:**

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

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

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

**Appendix 2. Schedule of Compliance**

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

**Appendix 3. Monitoring Requirements**

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

**Appendix 4. Recordkeeping**

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

**Appendix 5. Testing Procedures**

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

**Appendix 6. Permits to Install**

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N5656-2015. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N5656-2015b is being reissued as Source-Wide PTI No. MI-PTI-N5656-2020

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
133-13D*	NA	Incorporate PTI 133-13D into the ROP. PTI 133-13D permits the installation of two new controlled gravity fed adhesive coating lines (EU-PR2 and EU-PR3). EU-PR2 and EU-PR3 were added to FG-COATINGLINEA and FG-MACT MMMM. EU-PR3 was re-named EU-PR4 in the ROP per a request from the company.	EU-PR2, EU-PR4 FG-COATINGLINEA, FG-MACT MMMM
133-13C	201700118	Incorporate PTI 133-13C into the ROP. In PTI 133-13C, FGCOATINGLINE is separated into two Flexible Groups, FG-COATINGLINEA and FG-COATINGLINEB. G-COATINGLINEA is controlled and FG-COATINGLINEB is uncontrolled. In addition, PTI 133-13C permitted the installation and operation of one new gravity fed adhesive coating line, EU-PR1. EU-PR1 will be controlled by the facility's existing permanent	EU-PR1, FG-COATINGLINE, FG-COATINGLINEA, FG-COATINGLINEB, FG-MACT MMMM

		total enclosure (PTE) and regenerative thermal oxidizer (RTO) and is added to FG-COATINGLINEA.	
133-13B	201500081	Incorporate PTI 133-13B into the ROP. PTI 133-13B adds RTO and PTE requirements in FG-MACT MMMM table.	FG-COATINGLINE, FG-MACT MMMM

**Appendix 7. Emission Calculations**

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

**Appendix 8. Reporting**

**A. Annual, Semiannual, and Deviation Certification Reporting**

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

**B. Other Reporting**

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