Archived: Tuesday, December 17, 2019 4:16:27 PM

From: Sondra Wouch

**Sent:** Mon, 16 Dec 2019 22:26:05

To:

Cc: Christopher Blume Jessy Conard Kenworthy Mark Birch Ryan

Subject: N6226 - ROP Renewal Application

Sensitivity: Normal

**Attachments:** 

BNA Homer Disc Plant - ROP Renewal Application Form 12-16-2019.pdf 6226 ROP MARK-UP.docx 6226 - ROP

Renewal Attachment A - Supplemental Information.pdf

#### Dear Rex:

RPS is submitting on behalf of Brembo North America, Inc. the attached ROP Renewal Application. An administratively complete ROP renewal application is due by January 8, 2020 for ROP No. MI-ROP-N6226-2015a.

The submittal consists of the following elements:

- This email;
- The ROP Renewal Application Form;
- A mark-up of the current ROP;
- Attachment A: Supplemental Information;
  - Potential-to-emit calculations for criteria pollutants and HAP;
  - The most recent MAERS submittal forms (2018) for relevant emission units;
  - New emission unit MAERS forms.

As indicated in the ROP Renewal Application Form, the facility is adding five (5) emissions units that are exempt from requiring a Permit-to-Install, and are as follows:

- A coating/spray line under Rule 287(2)(c), EU-Line 57;
- A diesel fire pump engine under Rule 285(2)(g), EU-Diesel pump engine; and
- Three (3) spray booths under Rule 290, EU-Prototype, EU-67, EU-68.

Brembo will be meeting with EGLE AQD staff on December 18<sup>th</sup> to discuss incorporating and establishing emission limits of these five (5) units into its PTI.

Brembo is also requesting administrative changes to the following emission unit names and descriptions, which are described in the attached ROP mark-up:

- EU-GeoMet-01;
- EU-GeoMet-02;
- EU-GeoMet-03;
- EU-Magni-01;
- EU-Magni-02;
- EU-Magni-03;
- EU-Magni-04;
- EU-Magni-05;
- EU-Zinc-01;

- EU-Zinc-02;
- EU-Zinc-03;
- EU-Zinc-04; and
- EU-Zinc-05.

EU-Black was dismantled in November 2018 and EU-Zinc-06 was never installed; therefore, Brembo is requesting those two emission units be removed from the ROP.

The attached MAERS forms for the 2018 reporting year are for the disc plant only, as the foundry is not currently included in the ROP.

It is important to note that this ROP Renewal Application has been prepared to reflect the content of ROP No. MI-ROP-N6226-2015a, which is currently under USEPA 45-day review period.

This ROP Renewal Application has been submitted by mail and electronically to EGLE-ROP@michigan.gov for a 15-day administrative completeness review.

Please contact me or Chris Blume at 312.262.4371 or <u>Christopher.Blume@rpsgroup.com</u> if you have any questions regarding these matters.

Sincerely,

Sondra Wouch, E.I.T.

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# 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 <a href="http://michigan.gov/air">http://michigan.gov/air</a> (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 INF	ORIVIATION						
SRN	SIC Code	NAICS Code	Existing ROI	Number		Section Nun	nber (if applicable)
N6226		336340	MI-ROP-N	16226-20	)15a		
Source Name			•				
Brembo North	n America, Inc.						
Street Address							
29991 M-60 E	ast						
City		State	ZIP Co	ode	County		
Homer		MI	4924	5	Calhoun		
Section/Town/Ra	nge (if address not a	vailable)	<u> </u>		<b></b>		
	nn .						
Source Description	211						
•	rake parts coating	g facility.					
•		g facility.					
•		g facility.					
	rake parts coatin		different than	what an	nears in the exis	sting ROP Ide	entify any changes
Automotive br	rake parts coating	ove information is		what ap	pears in the exis	sting ROP. Ide	entify any changes
Automotive br	rake parts coating			what ap	pears in the exis	sting ROP. Ide	entify any changes
Automotive br  Check her on the ma	rake parts coating re if any of the ab rked-up copy of y	ove information is		what ap	pears in the exis	sting ROP. Ide	entify any changes
Automotive br Check her on the ma	rake parts coating re if any of the ab rked-up copy of y	ove information is		what ap	pears in the exis		entify any changes
Automotive br Check her on the ma  OWNER INFO Owner Name	rake parts coating re if any of the ab rked-up copy of y	ove information is		what ap	pears in the exis		
Automotive br  Check her on the ma  OWNER INFO  Owner Name  Brembo North	rake parts coating re if any of the above rked-up copy of y	ove information is our existing ROP		what ap	pears in the exis		
Check her on the ma  OWNER INFO Owner Name Brembo North Mailing address (	rake parts coating re if any of the above rked-up copy of your particular and an america, Inc.  check if same as	ove information is our existing ROP		what ap	pears in the exis		
Check her on the ma  OWNER INFO Owner Name Brembo North Mailing address (	rake parts coating re if any of the above rked-up copy of your particular and an america, Inc.  check if same as	ove information is our existing ROP		what ap	pears in the exis		
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Check her on the ma  OWNER INFO Owner Name Brembo North Mailing address (	rake parts coating re if any of the above rked-up copy of your part of the copy of your part of y	ove information is our existing ROP		what ap	pears in the exis		
Check her on the ma  OWNER INFO Owner Name Brembo North Mailing address (	rake parts coating re if any of the above rked-up copy of your part of the copy of your part of y	ove information is our existing ROP					mber (if applicable)
Check her on the ma  OWNER INFO Owner Name Brembo North Mailing address ( 47765 Halyard	rake parts coating re if any of the above rked-up copy of your part of the copy of your part of y	ove information is your existing ROP		ode	pears in the exis		

For Assistance 1 of 12 www/michigan.gov/egle Contact: 800-662-9278

SRN: N6226	Section Number (if applicable):

### 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			
Jessy			Conard			
Company Name & Mailing address ( chec	k if same as s	source address	s)			
City	State	ZIP Code		County	Country	
Phone number (517) 568-4398		E-mail add jconard(	dress @us.brem	bo.com		
Contact 2 Name (optional) Mark			Title Kenwort	hy		
Company Name & Mailing address (⊠ chec	k if same as s	source address	s)			
City	State	ZIP Code	e	County	Country	
Phone number (517) 568-4398 ext. 6213		E-mail a		s.brembo.com	l	
RESPONSIBLE OFFICIAL INFORI	MATION					
Responsible Official 1 Name Daniel M. Sandberg			Title Presider	nt and CEO		
Company Name & Mailing address (☐ chec 47765 Halyard Dr	k if same as s	source address	s)			
City Plymouth	State MI	ZIP Code 48170	е	County Wayne	Country USA	
Phone number (734) 468-2111	•	E-mail a		orembo.com		
Responsible Official 2 Name (optional)			Title			
Company Name & Mailing address (☐ chec	k if same as s	source address	5)			
City	State	ZIP Code	е	County	Country	
Phone number	I	E-mail a	ddress		l	
		I				
Check here if an Al-001 Form	is attached	d to provide	more info	rmation for Part	A. Enter Al-001 Form ID:	

For Assistance 2 of 12 www/michigan.gov/egle Contact: 800-662-9278

SRN: N6226	Section Number (if applicable):
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### 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.

1 3-41	an of DOD Annillanday Or of the Oliver				
LISTII	ng of ROP Application Contents. Check the box	for th	e items included with your applicati	on.	
	Completed ROP Renewal Application Form (and any Al-001 Forms) (required)		Compliance Plan/Schedule of Compli	iance	
	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 Appl	ication	
	Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations		Cross-State Air Pollution Rule (CSAP	R) Informa	ation
$\boxtimes$	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 prov	ided (requ	ired)
	Compliance Assurance Monitoring (CAM) Plan	×	Electronic documents provided (option	nal)	
	Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)		Other, explain:		
	bliance Statement				
existir	source is in compliance with <u>all</u> of its applicable requing ROP, Permits to Install that have not yet been inc able requirements not currently contained in the exis	orpor	ated into that ROP, and other	⊠ Yes	□ No
contai	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.			□ No	
This s	ource will meet in a timely manner applicable require term.	emen	ts that become effective during the	⊠ Yes	□No
existir	nethod(s) used to determine compliance for each applying ROP, Permits to Install that have not yet been incorrently contained in the existing ROP.	olicab orpora	le requirement is/are the method(s) spr ated into that ROP, and all other applic	ecified in t able requi	he rements
Inumbe	of the above are checked No, identify the emission uer(s) or applicable requirement for which the source renewal on an Al-001 Form. Provide a compliance p	is or v	vill be out of compliance at the time of i	ecuanca d	dition of the
Name	and Title of the Responsible Official (Print or Ty	pe)			
l	M. Sandberg, President and CEO				
As the	a Responsible Official, I certify that, based on in statements and information in this application a	forma re tru	ntion and belief formed after reasona le, accurate, and complete.	ble inqui	ry,
			·	V24	
Sig	nature of Responsible Official		/2/c// Date	5	

For Assistance Contact: 800-662-9278

3 of 12

www/michigan.gov/egle

EQP 6000 (revised 7-2019)

12/11/2019

Page 3 of 12

SRN: N6226	Section Number (if applicable):
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### 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 <u>all</u> 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 <u>not</u> been reported in MAERS for the most recent emissions reporting year? If <u>Yes</u> , identify the emission unit(s) that was/were not reported in MAERS on an Al-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 <u>Yes</u> , 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 <u>added or modified</u> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO <sub>2</sub> , VOC, lead) emissions?  If <u>Yes</u> , include potential emission calculations (or the PTI and/or ROP revision application	⊠ Yes	□No
	numbers, or other references for the PTE demonstration) for the added or modified equipment on an Al-001 Form.		
0.5	If No, criteria pollutant potential emission calculations do not need to be included.		
C5.	Has this stationary source <u>added or modified</u> 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 <u>Yes</u> , 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 Al-001 Form. Fugitive emissions <u>must</u> be included in HAP emission calculations. If <u>No</u> , 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 Al-001 Form.	☐ Yes	⊠ No
C7.	Are any emission units subject to the federal Acid Rain Program? If <u>Yes</u> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an Al-001 Form.	☐ Yes	⊠ No
	Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes	$oxed{oxed}$ 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 Al-001 Form. If a CAM plan	Yes	⊠ No
	has not been previously submitted to the MDEQ, 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 <u>Yes</u> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an Al-001 Form.		
	Check here if an Al-001 Form is attached to provide more information for Part C. Enter Al-001 For	m ID: AI	-1

For Assistance 4 of 12 www/michigan.gov/egle Contact: 800-662-9278

SRN: N6226 Section Number (if applicable):	
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### PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

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

required to be lis	have any emission units that do not appeted in the ROP application under R 336.1 lution Control Rules? If <u>Yes</u> , identify the e	212(4) (Rule 212(4)) of the	v. ⊠ Yes □ No
If <u>No</u> , go to Part	E.		
	that are subject to process specific emist either Part G or H of this application form ks).		
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)]
EU – Line 57	Spray Booth or Coating Line	Rule 212(4)(f)	Rule 287(2)(c)
EU – Diesel Fire Pump	Emergency Fire Pump Engine	Rule 212(4)(e)	Rule 285(2)(g)
Comments:			
☐ Check here if a	n Al-001 Form is attached to provide mor	e information for Part D. Enter A	Al-001 Form ID: Al-

For Assistance Contact: 800-662-9278 5 of 12

SRN: N6226	Section Number (if applicable):
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#### PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the <u>existing</u> ROP and answer the questions below as they pertain to <u>all</u> emission units and <u>all</u> 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?	⊠ Yes	□No
If <u>Yes</u> , identify changes and additions on Part F, Part G and/or Part H.	<del></del>	
E2. For each emission unit(s) identified in the existing ROP, <u>all</u> 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 <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u> , 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?	☐ Yes	⊠ No
If <u>Yes</u> , complete Part F with the appropriate information.  E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u> , identify the emission unit(s) and the dismantle date in the comment area below or on an Al-001 Form.	⊠ Yes	☐ No
Comments: EU-Black was removed November 2018. EU-Zinc 06 was never installed.		
Check here if an Al-001 Form is attached to provide more information for Part E. Enter Al-001 F	orm ID: Al-	

For Assistance 6 of 12 www/michigan.gov/egle Contact: 800-662-9278

SRN: N6226	Section Number (if applicable):
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### 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 <u>all</u> emission units with PTIs. Any PTI(s) identified below must be attached to the application.

	ated into the existing	where the applicable requirements from the PTI have not ROP? If <u>Yes</u> , complete the following table.	☐ Yes ⊠ No	
Permit to Install Number	Inite/Elevinie   ' ' '			
F2. Do any of the PTIs listed above change, add, or delete terms/conditions to <b>established emission units</b> in the existing ROP? If <u>Yes</u> , 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.				
F3. Do any of the PTIs listed above identify <b>new emission units</b> that need to be incorporated into the ROP? If <u>Yes</u> , 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.				
F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were <u>not</u> reported in MAERS for the most recent emissions reporting year? If Yes No Yes, identity the stack(s) that were not reported on the applicable MAERS form(s).				
or control devi	ces in the PTIs listed	tive changes to any of the emission unit names, descriptions above for any emission units not already incorporated into inges on an Al-001 Form.	☐ Yes ☐ No	
Comments:				
☐ Check here if	an Al-001 Form is a	attached to provide more information for Part F. Enter Al-001 I	Form ID: Al-	

For Assistance 7 of 12 www/michigan.gov/egle Contact: 800-662-9278

SRN: N6226	Section Number (if applicable):
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## 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.

	ny new and/or existing emission units which do <u>not</u> already appear in in ich meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.	
If Yes, identify the emiss	ion units in the table below. If <u>No,</u> go to Part H.	⊠ Yes □ No
	n units were installed under the same rule above, provide a description on/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	EU-Line 57: HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	Installed April 2019
Rule 290 process with limited emissions	EU-Prototype, EU-Line 67, EU-Line 68: HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	Installation date for all three booths: June 2020
Comments:		
Chock here if an Al 001	Form is attached to provide more information for Part G. Enter AL-001	Form ID: AI

For Assistance 8 of 12 www/michigan.gov/egle Contact: 800-662-9278

SRN: N6226	Section Number (if applicable):
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#### 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 <u>Yes</u> , 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 <u>Yes</u> , 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 <u>Yes</u> , 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?	☐ Yes	⊠ No
If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> 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.		
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , 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 <b>source-wide</b> requirements? If <u>Yes</u> , 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 <b>streamline</b> any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	Yes	⊠ No

For Assistance 9 of 12 www/michigan.gov/egle Contact: 800-662-9278

SRN: N6226	Section Number (if applicable):
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### PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete <b>emission limit</b> requirements? If <u>Yes</u> , 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 <b>material limit</b> requirements? If <u>Yes</u> , 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 <b>process/operational restriction</b> requirements? If <u>Yes</u> , 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 <b>design/equipment parameter</b> requirements? If <u>Yes</u> , 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 <b>testing/sampling</b> requirements? If <u>Yes</u> , 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 <b>monitoring/recordkeeping</b> requirements? If <u>Yes</u> , 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 <b>reporting</b> requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	Yes	⊠ No

For Assistance 10 of 12 www/michigan.gov/egle Contact: 800-662-9278

SRN: N6226	Section Number (if applicable):
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### PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15.Does the source propose to add, change and/or delete <b>stack/vent restrictions</b> ? If <u>Yes</u> , 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 <b>other</b> requirements? If <u>Yes</u> , 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 <u>Yes</u> , 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 Al-001 Form is attached to provide more information for Part H. Enter Al-001 For	m ID: Al-	

For Assistance 11 of 12 www/michigan.gov/egle Contact: 800-662-9278

### 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: N6226	Section Number (if applicable):	
1. Additional Information ID <b>AI-1</b>			
Additional Information			
2. Is This Information Confidential?		☐ Yes ⊠ No	
Five emissions units were not included in 2018 MAERS:  • Diesel fire pump engine (EU-Diesel Fire Pump)  • Coating/spray line (EU-Line 57), exempt from a PTI unc  • One coating booth (EU-Prototype), exempt from a PTI unc  • Two (2) coating booths (EU-Line 67, EU-Line 68), each	under Rule 290	der Rule 290	
		Page of	

For Assistance Contact: 800-662-9278 12 of 12

# NOVEMBER 25, 2019 PROPOSED MINOR MODIFICATION MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY AIR QUALITY DIVISION

EFFECTIVE DATE: July 8, 2015 REVISION DATE: {date of approval}

**ISSUED TO** 

#### BREMBO NORTH AMERICA, INC.

State Registration Number (SRN): N6226

LOCATED AT

29991 M-60 East, Homer, Michigan 49245

#### RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

Administratively Complete ROP Renewal Application Due Between January 8, 2019 and January 8, 2020

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-N6226-2015a

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 Environment, Great Lakes, and Energy

Rex Lane, Kalamazoo District Supervisor

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

### **TABLE OF CONTENTS**

A. GENERAL CONDITIONS       4         Permit Enforceability       4         General Provisions       5         Equipment & Design       5         Emission Limits       5         Testing/Sampling       5         Monitoring/Recordkeeping       6         Certification & Reporting       6         Permit Shield       7         Revisions       8         Reopenings       8         Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         F.G-G-GeoMet       18         FG-G-GeoMet       18         FG-G-GO-ATINGLINES       24         FG-CO-LDCLEANERS       25         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       39	AUTHORITY AND ENFORCEABILITY	3
General Provisions.       4         Equipment & Design       5         Emission Limits       5         Testing/Sampling       5         Monitoring/Recordkeeping       6         Certification & Reporting       6         Certification & Reporting       6         Revisions       8         Reopenings       8         Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-WACT MMMM       31         FG-BMG       24         FG-COLDELEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance.       39	A. GENERAL CONDITIONS	4
General Provisions.       4         Equipment & Design       5         Emission Limits       5         Testing/Sampling       5         Monitoring/Recordkeeping       6         Certification & Reporting       6         Certification & Reporting       6         Revisions       8         Reopenings       8         Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-WACT MMMM       31         FG-BMG       24         FG-COLDELEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance.       39	Permit Enforceability	4
Emission Limits       5         Testing/Sampling       5         Monitoring/Recordkeeping       6         Certification & Reporting       6         Permit Shield       7         Revisions       8         Reopenings       8         Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-G-GeoMet       18         FG-Zinc       24         FG-CO-CATINGLINES       24         FG-CO-CATINGLINES       28         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 5. Testing Procedures		
Testing/Sampling         5           Monitoring/Recordkeeping         6           Certification & Reporting         6           Permit Shield         7           Revisions         8           Reopenings         8           Renewals         8           Renewals         8           Reristospheric Ozone Protection         9           Risk Management Plan         9           Emission Trading         9           Permit To Install (PTI)         9           B. SOURCE-WIDE CONDITIONS         11           C. EMISSION UNIT CONDITIONS         12           EMISSION UNIT SUMMARY TABLE         12           D. FLEXIBLE GROUP CONDITIONS         16           FLEXIBLE GROUP SUMMARY TABLE         16           FG-GeoMet         18           FG-GeoMet         18           FG-GeoMet         24           FG-Zinc         24           FG-Zinc         24           FG-COATINGINES         28           FG-MACT MMMM         31           FG-COLDCLEANERS         35           E. NON-APPLICABLE REQUIREMENTS         37           Appendix 1. Acronyms and Abbreviations         38           Appendix	Equipment & Design	5
Monitoring/Recordkeeping       6         Certification & Reporting       6         Permit Shield       7         Revisions       8         Reopenings       8         Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FG-GeoMet       18         FG-GeoMet       18         FG-GeoMet       18         FG-GOATINGLINES       24         FG-COLDILEANERS       28         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Termits to Install       39         Appendix 7. Emission Calculations </td <td></td> <td></td>		
Certification & Reporting       6         Permit Shield       7         Revisions       8         Reopenings       8         Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-GeoMet       18         FG-G-COATINGLINES       21         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7	Testing/Sampling	5
Permit Shield         7           Revisions         8           Reopenings         8           Renewals         9           Risk Management Plan         9           Emission Trading         9           Permit To Install (PTI)         9           B. SOURCE-WIDE CONDITIONS         11           C. EMISSION UNIT CONDITIONS         12           EMISSION UNIT SUMMARY TABLE         12           D. FLEXIBLE GROUP CONDITIONS         16           FLEXIBLE GROUP SUMMARY TABLE         16           FG-Geodet         18           FG-BMG         21           FG-Zinc         24           FG-COATINGLINES         28           FG-MACT MMMM         31           FG-COLDCLEANERS         35           E. NON-APPLICABLE REQUIREMENTS         37           Appendix 1. Acronyms and Abbreviations         38           Appendix 2. Schedule of Compliance         39 <t< td=""><td>Monitoring/Recordkeeping</td><td> 6</td></t<>	Monitoring/Recordkeeping	6
Revisions       8         Reopenings       8         Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-COAT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 7. Emission Calculations       40	Certification & Reporting	6
Reopenings       8         Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40	Permit Shield	7
Renewals       8         Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-Zinc       24         FG-WACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40		
Stratospheric Ozone Protection       9         Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-Zinc       24         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40	Reopenings	8
Risk Management Plan       9         Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40		
Emission Trading       9         Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40		
Permit To Install (PTI)       9         B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40		
B. SOURCE-WIDE CONDITIONS       11         C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40		
C. EMISSION UNIT CONDITIONS       12         EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40	Permit To Install (PTI)	9
EMISSION UNIT SUMMARY TABLE       12         D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40	B. SOURCE-WIDE CONDITIONS	11
D. FLEXIBLE GROUP CONDITIONS       16         FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40	C. EMISSION UNIT CONDITIONS	12
FLEXIBLE GROUP SUMMARY TABLE       16         FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40	EMISSION UNIT SUMMARY TABLE	12
FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40	D. FLEXIBLE GROUP CONDITIONS	16
FG-GeoMet       18         FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40	FLEXIBLE GROUP SUMMARY TABLE	16
FG-BMG       21         FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40		
FG-Zinc       24         FG-COATINGLINES       28         FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40		
FG-MACT MMMM       31         FG-COLDCLEANERS       35         E. NON-APPLICABLE REQUIREMENTS       37         APPENDICES       38         Appendix 1. Acronyms and Abbreviations       38         Appendix 2. Schedule of Compliance       39         Appendix 3. Monitoring Requirements       39         Appendix 4. Recordkeeping       39         Appendix 5. Testing Procedures       39         Appendix 6. Permits to Install       39         Appendix 7. Emission Calculations       40		
FG-COLDCLEANERS	FG-COATINGLINES	28
E. NON-APPLICABLE REQUIREMENTS37APPENDICES38Appendix 1. Acronyms and Abbreviations38Appendix 2. Schedule of Compliance39Appendix 3. Monitoring Requirements39Appendix 4. Recordkeeping39Appendix 5. Testing Procedures39Appendix 6. Permits to Install39Appendix 7. Emission Calculations40	FG-MACT MMMM	31
APPENDICES	FG-COLDCLEANERS	35
Appendix 1. Acronyms and Abbreviations	E. NON-APPLICABLE REQUIREMENTS	37
Appendix 2. Schedule of Compliance.39Appendix 3. Monitoring Requirements.39Appendix 4. Recordkeeping.39Appendix 5. Testing Procedures.39Appendix 6. Permits to Install.39Appendix 7. Emission Calculations.40	APPENDICES	38
Appendix 2. Schedule of Compliance.39Appendix 3. Monitoring Requirements.39Appendix 4. Recordkeeping.39Appendix 5. Testing Procedures.39Appendix 6. Permits to Install.39Appendix 7. Emission Calculations.40	Appendix 1 Acronyms and Abbreviations	38
Appendix 3. Monitoring Requirements		
Appendix 4. Recordkeeping	!!	
Appendix 5. Testing Procedures		
Appendix 6. Permits to Install		
Appendix 7. Emission Calculations		
	!!	

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### **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 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.

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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))
- 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.,

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

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": (R 336.1301(1)):
  - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent 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. (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))**

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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.
  - 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.

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

- 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.<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)):
  - 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))
  - 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))

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

- 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))** 

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### **Stratospheric Ozone Protection**

- 36. If the permittee is subject to Title 40 of the 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 82Subpart 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 Part 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.<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))

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

- **45.** The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² (R 336.1219)
- **46.** If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<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>&</sup>lt;sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### **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.

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

### 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-Line 50 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	09-01-09	FG-GeoMet FG-COATINGLINES FG-MACT MMMM
EU-Line 55 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	11-01-11	FG-GeoMet FG-COATINGLINES FG-MACT MMMM
EU-Line 56 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	8-15-2016	FG-BMG FG-COATINGLINES FG-MACT MMMM

	F111V0. IVII-F11-IV0220-2013a				
Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID		
(dismantled November 2018)					
EU-Line 1 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	02-01-01	FG-Zinc FG-COATINGLINES FG-MACT MMMM		
EU-Line 45 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	07-01-06	FG-Zinc FG-COATINGLINES FG-MACT MMMM		
EU-Line 60 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	07-01-06	FG-Zinc FG-COATINGLINES FG-MACT MMMM		

PTI NO: IVII-PTI-N6226-2015				
Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID	
EU-Line 65 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	05-01-09	FG-Zinc FG-COATINGLINES FG-MACT MMMM	
EU-Line 45 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	12-18-13	FG-Zinc FG-COATINGLINES FG-MACT MMMM	
(never installed)				
EU-Line 42 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	05-01-10	FG-BMG FG-COATINGLINES FG-MACT MMMM	

		1 11110.1011 1	1110220 20130
EU-Line 62	HVLP spray guns apply coatings to	08-01-11	FG-BMG FG-COATINGLINES
(rename)	multiple surfaces of brake products. One and/or multiple paint booths are used to		FG-MACT MMMM
	apply paint product to the surfaces. Brake		
	products may be heated before and/or after the part is painted. Associated cool		
	down/drying areas allow the brake products to dry, cure and/or cool down.		
	Dry filters are used to collect any overspray from the coating process.		
	Toverspray from the coating process.		

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID	
EU-Line 63 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	11-20-13	FG-BMG FG-COATINGLINES FG-MACT MMMM	
EU-Line 64 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	12-18-13	FG-BMG FG-COATINGLINES FG-MACT MMMM	
EU-Line 66 (rename)	HVLP spray guns apply coatings to multiple surfaces of brake products. One and/or multiple paint booths are used to apply paint product to the surfaces. Brake products may be heated before and/or after the part is painted. Associated cool down/drying areas allow the brake products to dry, cure and/or cool down. Dry filters are used to collect any overspray from the coating process.	04-01-14	FG-BMG FG-COATINGLINES FG-MACT MMMM	
EU-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h), or Rule 285(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.	02-01-01	FG-COLDCLEANERS	

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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-GeoMet	Two automotive metal surface coating lines.	
		EU-Line 50
		EU-Line 55
FG-BMG	Six (6) automotive metal surface coating lines.	
		EU-Line 56
		(dismantled)
		EU-Line 42
		EU-Line 62
		=
		EU-Line 63
		EU-Line 64
		EU-Line 66
FG-Zinc	Five automotive metal surface coating lines.	
		EU-Line 1
		EU-Line 45
		EU-Line 60
		EU-Line 65
		EU-Line 45
		(never
		installed)

	F I I NO. IVI	1-P11-100220-2013a
FG-COATINGLINES	Thirteen (13) automotive metal surface coating lines.	
		EU-Line 50
		EU-Line 55
		EU-Line 56
		(dismantled)
		FILL: 40
		EU-Line 42
		EU-Line 62
		EU-Line 63
		EU-Line 64
		EU-Line 66
		EU-Line 1
		EU-Line 45
		EU-Line 60
		EU-Line 65
		EU-Line 45
		(never
		installed)

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
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. The 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-Line 50  EU-Line 55  EU-Line 56 (dismantled)  EU-Line 42 EU-Line 62 EU-Line 63 EU-Line 64 EU-Line 66 EU-Line 1 EU-Line 45 EU-Line 60 EU-Line 65 EU-Line 45 (never installed)
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h), or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EU-COLDCLEANERS

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

# FG-GeoMet FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Two automotive metal surface coating lines.

Emission Units: EU-Line 50, EU-Line 55

#### **POLLUTION CONTROL EQUIPMENT**

Dry filters are used to collect any overspray from the coating process.

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	2,000 pounds per month <sup>2</sup>	Calendar month	Each EU of FG-GeoMet	SC VI.1 through SC VI.3	R 336.1702(d)
2. VOCs	10.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Each EU of FG-GeoMet	SC VI.1 through SC VI.3	R 336.1702(d)

#### II. MATERIAL LIMIT(S)

NA

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

- 1. The permittee shall capture all waste coatings, cleanup and purge solvents (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 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and / or 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(a))

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

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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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 written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2004(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 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 336.1225, R 336.1702)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, cleanup and purge solvents, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a calendar day basis for FG-GeoMet:
  - a. Gallons (with water) of each coating, cleanup and purge solvents (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 pounds per calendar month for each EU of FG-GeoMet.
  - 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 FG-GeoMet.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.<sup>2</sup> (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))
- 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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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. SV0042 (Paint Booth, EU-Line 50)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV0043 (Paint Booth, EU-Line 50)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV0045 (Cure Station, EU-Line 50)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV0046 (Exhaust, EU-Line 50)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV0047 (Exhaust, EU-Line 50)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV0053 (Paint Booth, EU-Line 55)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
7. SV0054 (Paint Booth, EU-Line 55)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
8. SV0057 (Paint Booth, EU-Line 55)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
9. SV0058 (Paint Booth, EU-Line 55)	202	40 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)

#### IX. OTHER REQUIREMENT(S)

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

#### Footnotes:

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

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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

# FG-BMG FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Six (6) automotive metal surface coating lines.

Emission Unit: EU-Line 56, (dismantled), EU-Line 42, EU-Line 62, EU-Line 63,

EU-Line 64, EU-Line 66

#### POLLUTION CONTROL EQUIPMENT

Dry filters are used to collect any overspray from the coating process.

#### I. <u>EMISSION LIMIT(S)</u>

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	6.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Each EU of FG-BMG	SC VI.2, SC VI.3	R 336.1702(a)
2. VOCs	42.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Each EU of FG-BMG	SC VI.2, SC VI.3	R 336.1702(a)

#### II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	3.5 lb/gal (minus water) <sup>a</sup> as applied <sup>2</sup>	Instantaneous	FG-BMG	SC V.1, SC VI.2	R 336.1702(a)

<sup>&</sup>lt;sup>a</sup> The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))

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

- 1. The permittee shall capture all waste coatings, cleanup and purge solvents (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 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and / or 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(a))

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

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

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

#### V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<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 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 336.1225, R 336.1702)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, cleanup and purge solvents, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a calendar month basis for FG-BMG, and for each individual emission unit in FG-BMG:
  - a. Gallons (with water) of each coating, cleanup and purge solvents (material) used and reclaimed.
  - b. VOC content (minus water and 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.

The permittee shall keep the records 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))
- 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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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
(dismantled)			
2. SV0052 (Exhaust, EU-Line 42)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV0068 (Exhaust, EU-Line 62)	202	40 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV0063 (Exhaust, EU-Line 63)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV0064 (Exhaust, EU-Line 64)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV0065 (Exhaust, EU-Line 66)	202	40 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)
7. SV0066 (Exhaust, EU-Line 56)	20 <sup>2</sup>	40 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)
8. SV0067 (Exhaust, EU-Line 56)	20 <sup>2</sup>	402	R 336.1225, 40 CFR 52.21(c) & (d)

#### IX. OTHER REQUIREMENT(S)

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

#### Footnotes:

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

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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

# FG-Zinc FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Five automotive metal surface coating lines.

Emission Units: EU-Line 1, EU-Line 45, EU-Line 60, EU-Line 65, EU-Line 45, (never installed)

#### POLLUTION CONTROL EQUIPMENT

Dry filters are used to collect any overspray from the coating process.

#### I. <u>EMISSION LIMIT(S)</u>

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	15.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Each EU in FG-Zinc	SC V.1, SC VI.2, SC VI.3	R 336.1702(a)
2. VOCs	62.6 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Each EU in FG-Zinc	SC V.1, SC VI.2, SC VI.3	R 336.1702(a)
3. Ethylbenzene (CAS No. 100-41-4)	4.68 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	Each EU in FG-Zinc	SC VI.2, SC VI.4	R 336.1225(2)

#### II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	11.0 pounds per gallon of applied coating solids <sup>2</sup>	Calendar day	Each EU in FG-Zinc	SC V.1, SC V.2, SC VI.5	R 336.1702(a)

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

- 1. The permittee shall capture all waste coatings, cleanup and purge solvents (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 336.1224, R 336.1225, R 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

covered at all times except when operator access is necessary.<sup>2</sup> (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))

#### IV. <u>DESIGN/EQUIPMENT PARAMETER(S)</u>

- 1. The permittee shall not operate FG-Zinc unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910)
- 2. The permittee shall equip and maintain FG-Zinc with HVLP applicators or comparable technology with a minimum transfer efficiency of 70.0 percent. For HVLP applicators, the permittee shall keep test caps available for pressure testing.<sup>2</sup> (R 336.1702(a))

#### V. TESTING/SAMPLING

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

- 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 written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))
- 2. At least once every three (3) years from the most recent performance test, the permittee shall verify the transfer efficiency of each emission unit in FG-Zinc, by testing at owner's expense, in accordance with Department requirements and R 336.2040(9). In addition, using the data contained in these test results, the permittee shall demonstrate compliance with the pounds of VOC per gallon of applied coating solids (GACS) emission limitations specified in SC II.1 for each emission unit in FG-Zinc.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(9))
  - a. No less than 60 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.
  - b. Verification of transfer efficiency and the pounds of VOC per gallon of applied coating solids (GACS) emission limitations specified in SC II.1 for each emission unit in FG-Zinc includes the submittal of 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. Applicable baseline operating parameters listed in R 336.2040(9)(p) shall be included with the test report.
  - c. The permittee shall review the operating conditions annually after the initial test and demonstrate to the Department that significant changes have not occurred in coating technology, the parts coated, or the processing sequence. The most recent test results shall remain valid until the next scheduled test if the permittee demonstrates that significant change has not occurred. Significant product, processing, material, or application equipment changes shall necessitate retesting of the transfer efficiency. The retesting shall be done as soon as practicable, but not more than 180 days after the start-up and stabilization of the new product, process, material, or application equipment. New transfer efficiency values determined by the retest shall be used retroactively to the start-up of the new product, process, material, or application equipment.

#### 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 336.1225, R 336.1702)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, cleanup and purge solvents, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702)

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

- 3. The permittee shall keep the following information on a calendar month basis for FG-Zinc, and for each emission unit in FG-ZINC:
  - a. Gallons (with water) of each coating, cleanup and purge solvents (material) used and reclaimed.
  - b. VOC content (minus water and 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.

The permittee shall keep the records 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))

- 4. The permittee shall keep the following information on a calendar month basis for FG-Zinc:
  - a. Gallons of each ethylbenzene (CAS No. 100-41-4) containing material used and reclaimed.
  - b. The ethylbenzene (CAS No. 100-41-4) content in pounds per gallon of each material used.
  - c. Ethylbenzene (CAS No. 100-41-4) mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d. Ethylbenzene (CAS No. 100-41-4) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request. (R 336.1225(2))

- 5. The permittee shall keep daily usage, VOC, solids content, transfer efficiency, and emissions calculations records for each emission unit in FG-Zinc. The records shall be kept in a format acceptable to the AQD District Supervisor, and as a minimum, shall indicate the following for each emission unit in FG-Zinc:
  - a. The coating(s) used in each spray booth.
  - b. The daily usage rate of each material (in gallons with water).
  - c. The calculated daily VOC content of each coating material (in pounds of VOC per gallon, as applied).
  - d. The calculated daily solids content, by volume, of each coating material (in gallons solids pergallon coating, as applied).
  - e. The calculated total pounds of VOCs emitted on a daily basis.
  - f. The calculated total gallons of solids applied on a daily basis.
  - The calculated daily VOC emission rate in pounds per gallon of applied coating solids.

Calculations of daily values shall be completed on a monthly basis, by the 15<sup>th</sup> day of the calendar month, for the previous calendar month. All such records are for the purpose of compliance demonstration. All records shall be kept on file and made 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))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of FG-Zinc, 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 EU-Zinc-06.<sup>2</sup> (R 336.1201(7)(a))

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

5. The permittee shall review operating conditions of FG-Zinc on an annual basis, as required by SC V.2. As part of the review, the permittee shall document any product, processing, material, or application equipment changes, or changes to baseline operating parameters that were established during the transfer efficiency test. The permittee shall conduct the review by December 12 of each year, and submit an annual report to the AQD District Supervisor in an acceptable format within 30 days following the date the review was conducted.<sup>2</sup> (R 336.1702(a), R 336.2040(9)(p))

#### See Appendix 8

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

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

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV0026 (Exhaust, EU-Line 1)	20 <sup>2</sup>	40²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV0022 (Spray Station, EU-Line 45)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV0023 (Flash Off, EU-Line 45)	20 <sup>2</sup>	402	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV0025 (Cooling Zone, EU-Line 45)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV0048 (Exhaust, EU-Line 60)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV0059 (Exhaust, EU-Line 65)	202	402	R 336.1225, 40 CFR 52.21(c) & (d)
7. SV0061 (Spray Station, EU-Line 45)	202	40 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d)
(never installed)			

#### IX. OTHER REQUIREMENT(S)

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

#### Footnotes:

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

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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

# FG-COATINGLINES FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Thirteen (13) automotive metal surface coating lines.

**Emission Unit:** EU-Line 50, EU-Line 55, EU-Line 56, (dismantled), EU-Line 42, EU-Line 62, EU-Line 63, EU-Line 64, EU-Line 66, EU-Line 45, EU-Line 65, EU-Line 65, EU-Line 45, (never installed)

#### **POLLUTION CONTROL EQUIPMENT**

Dry filters are used to collect any overspray from the coating process.

#### I. <u>EMISSION LIMIT(S)</u>

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	62.6 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FG-COATINGLINES	SC VI.2, SC VI.3	R 336.1702(a)

#### II. MATERIAL LIMIT(S)

NA

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

- 1. The permittee shall capture all waste coatings, cleanup and purge solvents (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 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and / or 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(a))

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

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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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 336.1225, R 336.1702)
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, cleanup and purge solvents, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a calendar month basis for FG-COATINGLINES: a. Gallons (with water) of each coating, cleanup and purge solvents (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 for FG-COATINGLINES.
  - <u>d.</u> <u>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.</u>

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.<sup>2</sup> (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))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be
  postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R
  336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### IX. OTHER REQUIREMENT(S)

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

#### 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).

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

# 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-50, EU-55, EU-56, , EU-42, EU-62, EU- 63, EU-64, EU-66, EU-1, EU-45, EU-60, EU-65, EU-45,

#### **POLLUTION CONTROL EQUIPMENT**

Dry filters are used to collect any overspray from the coating process.

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	2.6 lb/gal of	12-month rolling time	Existing –	SC VI.1 through	40 CFR
	coating solids <sup>2</sup>	period as determined at	General Use Coating	SC VI.5	63.3890(b)(1)
	_	the end of each calendar			
		month			

#### 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		
Each Thinner and/or Additive	No Organic HAP <sup>2</sup> *	Instantaneous	Each Coating Operation using Compliant Material Option	SC VI.1 through SC VI.5	40 CFR 63.3891(a)		
2. Each Cleaning Material	No Organic HAP <sup>2</sup> *	Instantaneous	Each Coating Operation using Compliant Material Option	SC VI.1 through SC VI.5	40 CFR 63.3891(a)		
* Determined acco	* Determined according to 40 CFR 63.3941(a).						

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

- 1. 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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

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)

- 2. 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))
- 3. 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))

#### 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 conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12<sup>th</sup> 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.<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 CFR 63.3931.2 (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<sup>2</sup>:
  - a. A copy of each notification and report that is submitted to comply with Subpart MMMM, and the documentation supporting each notification and report. (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. **(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. (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. **(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. (40 CFR 63.3930(c)(3))
  - f. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

- source, the permittee may maintain purchase records for each material used rather than a record of the volume used. (40 CFR 63.3930(d))
- g. 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. (40 CFR 63.3930(e))
- h. The volume fraction of coating solids for each coating used during each compliance period. (40 CFR 63.3930(f))
- i. The density of for each coating, thinner and/or other additive, and cleaning material used during each compliance period. (40 CFR 63.3930(g))
- j. 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). (40 CFR 63.3930(h))
- k. The date, time, and duration of each deviation. (40 CFR 63.3930(j))
- **4.** 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)**
- 5. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to 40 CFR 63.3951(a) through (g).<sup>2</sup> (40 CFR 63.3952)

#### VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be
  postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R
  336.1213(4)(c))
- 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).2 (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).2 (40 CFR 63.3952(b))
- 6. The Permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910.2 (40 CFR Part 63 Subparts A and MMMM)
- 7. 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))

#### See Appendix 8

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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 MMMM for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date.<sup>2</sup> (40 CFR Part 63 Subparts A and MMMM)

#### Footnotes:

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

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

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

# FG-COLDCLEANERS FLEXIBLE GROUP CONDITIONS

#### **DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h), or Rule 285(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: EU-COLDCLEANERS** 

#### **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(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(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))

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

#### V. TESTING/SAMPLING

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

NA

#### VI. MONITORING/RECORDKEEPING

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

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner (R 336.1213(3)):
  - a. A serial number, model number, or other unique identifier for each cold cleaner.
  - b. The date the unit was installed, manufactured or that it commenced operation.
  - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(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))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be
  postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R
  336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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).

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

### **APPENDICES**

**Appendix 1. Acronyms and Abbreviations** 

AQD Air Quality Division BACT Best Available Control Technology CAA Clean Air Act CAM Compliance Assurance Monitoring CEM Continuous Emission Monitoring CEMS Continuous Emission Monitoring CEMS Continuous Emission Monitoring CEMS Continuous Emission Monitoring CEMS Continuous Emission Monitoring Department Code of Federal Regulations COM Continuous Department of Environment, Great Lakes, and Energy Michigan Department of Environment, Great Lakes, and Energy 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 Initial Risk Screening Level Initial Threshold Screening Level Initial Threshold Screening Level MACT Maximum Achievable Control Technology MAERS Michigan Air Emissions Rate MACA National Ambient Air Quality Standards NSS Material Safety Data Sheet NAA Not Applicable NSPS New Source Performance Standards NSPS New Source Review PS Performance Specification PS Permit to Install RACT Reasonable Available Control Technology RACRS Selective Catalytic Reduction SRN Selective Catalytic Reduction SRN State Registration Number COC Carbon Monoxide CCarbon Dioxide Equivalent dscr Dy standard cubic neter COC Carbon Dioxide Equivalent dscr Dry standard cubic neter PF Permit to Install RACT Reasonable Available Control Technology RACRS Selective Catalytic Reduction SRN State Registration Number COC Carbon Dioxide Equivalent COC Carbon Dioxide Equivalent COC Carbon Dioxide Equivalent dscr Dry standard cubic neter PF Permit on Install RACT Reasonable Available Control Technology RACRS Selective Non-Methage Cocycle Carbon Dioxide Equivalent COC Carbon Monoxide Cocycle Carbon Monoxid	Appendix 1.	Appendix 1. Acronyms and Appreviations  Common Acronyms  Pollutant / Measurement Abbreviations				
BACT Best Available Control Technology CAA Clean Air Act Compliance Assurance Monitoring CEMS Continuous Emission Monitoring CEMS Continuous Emission Monitoring CFM Code of Federal Regulations CFM Continuous Emission Monitoring CFM Continuous Emission Monitoring CFM Continuous Emission Monitoring CFM Continuous Emission Monitoring CFM Continuous Capacity Monitoring CFM Continuous Opacity Monitoring CFM Continuous Capacity Monitoring CFM Continuous Capacity CFM Conti	AOD					
CAM Clean Air Act CAM Compliance Assurance Monitoring CEM Continuous Emission Monitoring CEMS Continuous Emission Monitoring CEMS Continuous Emission Monitoring System CRFR Code of Federal Regulations COM Corbinuous Opacity Monitoring CEMS Continuous Opacity Monitoring CEMS Continuous Continuous Opacity Monitoring CEMS Continuous Continuous Opacity Monitoring CEMS Continuous Continuous Opacity Monitoring CEMS Continuous Continuous Opacity Monitoring CCO-C Carbon Dioxide Equivalent CASC Code of Cederal Regulations Continuous Continuous Continuous Opacity Monitoring CEMS Continuous Continuous Continuous Opacity Monitoring CASC Gallons of Applied Coating Solids CASC Gallons of Applied Coating Solids CACS Gallons Of Applied Coa		•		•		
CAM Compliance Assurance Monitoring CD Core Carbon Monoxide CEMS Continuous Emission Monitoring System CFM Code of Federal Regulations COM Continuous Opacity Monitoring System CFM Code of Federal Regulations Opacity Monitoring Communication Communicatio		<del>- ,</del>				
CEMS Continuous Emission Monitoring System CFR Code of Federal Regulations COM Continuous Opacity Monitoring System COM Continuous Opacity Monitoring Department Department Department Department Department Lakes, and Energy 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 MIVLP High Volume Low Pressure* ID Identification Initial Risk Screening Level Initial Risk Screening Level LAER LACER LOwest Achievable Emission Rate MACT Maximum Achievable Control Technology MAERS Michigan Air Emissions Reporting System MAP MAP MAP MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet NA NA Not Applicable NAAQS National Ambient Air Quality Standards NSPS New Source Performance Standards NSPS 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 Selective Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection Agency Vocable Equivalent dusc for by standard cubic ineter Spr y standard cubic meter Degrees Fahrenheit Degrees Fahrenheit Degrees Fahrenheit Prese Grains FP Parage Grains FP HAP Hazardous Air Pollutant HP Horver HP Horspewer HP HP Horspewer HP HP Horspewer HP HP Horspewer HP HP Horspewer HR HR HIGHER HR HR HEARAITOUS Air Visionation NAW Millignam mm Millimeter MAD Million MW Megaw				<u> </u>		
CEMS COntinuous Emission Monitoring System COR COM Continuous Opacity Monitoring Department/ 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 BHVLP High Volume Low Pressure* ID Identification INSL Initial Risk Screening Level Initial Threshold Screening Level Initial Threshold Screening Level Initial Threshold Screening System MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet NA Not Applicable NAAOS National Ambient Air Quality Standards NSPS New Source Performance Standards NSPS New Source Performance Standards NSPS New Source Review PS P Performance Specification PSD PREPA Permitte In Istall RACT Reasonable Available Control Technology ROP Renewable Operating Permit SC Special Condition PSC Special Condition TAC Screening Level Initial Threshold Screening Level MM Million Million MM Million Million MM Million Million MM Million Million MOC Non-methane Organic Compounds Non-methane Organic Compo		•				
CFR Code of Federal Regulations Combined Combined Combined Continuous Opacity Monitoring Michigan Department of Environment, Great Lakes, and Energy Michigan Subject Group Has Michigan Air Pollutant Michigan Air Emission Rate MACT Maximum Achievable Control Technology MAERS Michigan Air Emission Rate MACT Maximum Achievable Control Technology MAERS Michigan Air Emission Saperting System MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet NA Not Applicable NAQS National Ambient Air Quality Standards MSPS New Source Performance Standards NSPS New Source Performance Standards NSPS New Source Performance Specification PSD 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 TAC Toxic Air Contaminant Temporature SCR Selective Catalytic Reduction SRN State Registration Number TEQ Toxicity Equivalence Quotient USEPA/EPA United States Environmental Protection PCC Vodatile Organic Compounds		<del>-</del>		•		
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<sup>\*</sup>For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

#### 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 PTI and/or Operate that relate to the identified emission units or flexible groups as of the effective date of this ROP. This includes all PTI and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-N6226-2015. The PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
145-12A	Thirteen automotive metal surface coating lines.	FG-GeoMet FG-Magni&Black FG-Zinc FG-MISCMETAL FG-MACT MMMM

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-N6226-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
145-12B	201800084 / {DATE of ISSUANCE}	Incorporate PTI 145-12B into the ROP which was to add two paint lines ("GeoMet 3" and "Zinc 6"), and to change the VOC emission limits for existing flexible groups in the ROP for their disk coating plant. Additionally, FG-Magni&Black was	EU-Zinc-06 FG-GeoMet FG-BMG FG-Zinc

ROP No: MI-ROP-N6226-2015a Expiration Date: July 8, 2020 PTI No: MI-PTI-N6226-2015a

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
		changed to FG-BMG, and FG-COATINGLINES was added to cover all the coating lines at the facility, therefore, FG-MISCMETAL was removed from the ROP since it only covered two emission units that were limited to 10 tons per year each, and was less than the 30 tons per year for "all metal parts coating lines per R 336.1621(10)(b). PTI 145-12B was not required to go through the public participation process.	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 the 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.



# Attachment A Supplemental Information



**Potential-to-Emit Calculations** 

C:\Users\Sondra.Wouch\Documents\BNA\Michigan ROP Renewal\BNA Homer Disc Plant - Updated PTE Calcs 12-11-19

# Table B-1 BNA Homer Disc Plant PTE Calculations for ROP Renewal Application 12/11/2019

	Pollutant (ton/yr)						
Process/ Description	VOC	PM	СО	Lead	SO <sub>2</sub>	NO <sub>2</sub>	HAP
Disc Plant <sup>2</sup>	62.6	NA	NA	NA	NA	NA	4.68
Line 57 coating line <sup>1,3</sup>	3.12	NA	NA	NA	NA	NA	0.01
Fire pump engine <sup>1,4</sup>	0.13	0.11	0.34	NA	0.105	1.58	2.71
1 paint booth - Prototype Area <sup>1,5</sup>	6.00	NA	NA	NA	NA	NA	6.00
2 paint booths - WL project <sup>1,5</sup>	12.00	NA	NA	NA	NA	NA	12.00
Total =	83.85	0.11	0.34	NA	0.105	1.58	25.40

#### Note:

<sup>&</sup>lt;sup>1</sup> Exempt from obtaining PTI.

<sup>&</sup>lt;sup>2</sup> VOC and HAP (ethylbenzene) emissions are based on limits in PTI No. 145-12B and in current draft ROP that is under USEPA 45-day review period for a proposed Minor Modification.

<sup>&</sup>lt;sup>3</sup> Rule 287(2)(c)(i) - Coating use rate not more than 200 gallons, as applied, minus water, per month. PTE calculated using 200 gal/mo for paint with highest pollutant % (see Table B-2).

<sup>&</sup>lt;sup>4</sup> Rule 285(2)(g) - max heat input for internal combustion engine under this exemption is 10,000,000 BTU/hr. See Table B-3 for PTE calcs.

<sup>&</sup>lt;sup>5</sup> Rule 290(2)(a) - maximum of 1,000 lb/mo uncontrolled air contaminant emissions. See Table B-4 for PTE calcs.

C:\Users\Sondra.Wouch\Documents\BNA\Michigan ROP Renewal\BNA Homer Disc Plant - Updated PTE Calcs 12-11-19

Table B-2 BNA Homer Disc Plant Line 57 PTE Calculations 12/11/2019

200 gal/mo
2,400 gal/yr
19.7 lb/gal; which does <u>not</u> exclude water (density)
47,280 lb/yr of paint
0.05% by wt HAP (toluene)
24 lb HAP/yr (toluene)
0.01 ton HAP/yr (toluene)

200 gal/mo 2,400 gal/yr 2.6 lb VOC/gal 6,240 lb VOC/yr **3.12 ton VOC/yr** 

#### Notes:

Based on the VOC and HAP content of Magni paint.

Table B-3
BNA Homer Disc Plant
Fire Pump Engine PTE Calculations
12/11/2019

Pollutant	Small Engine Emission Factor (lb/hp-hr)	Annual Emissions (tpy)
NOx	0.031	1.58
SOx	2.05E-03	0.10
CO	6.68E-03	0.34
VOC	2.47E-03	0.13
PM/PM10/PM2.5	2.20E-03	0.11
	Small Engine	
	Emission	Annual
	Factor	<b>Emissions</b>
Pollutant	(lb/MMbtu)	(tpy)
HAP (total)		2.71
Benzene	9.33E-04	0.67
Toluene	4.09E-04	0.29
Xylenes	2.85E-04	0.20
1,3-Butadiene	3.91E-05	0.03
Formaldehyde	1.18E-03	0.84
Acetaldehyde	7.67E-04	0.55
Acrolein	9.25E-05	0.07
Napthalene	8.48E-05	0.06

Max heat input 1.43 MMbtu/hr

Max heat input 204 hp
Annual Operating Hours 500 hr/yr
Annual Energy Consumption 102,054 hp-hr

#### Notes:

Emission factors from AP-42 Table 3.3-1 and Table 3.3-2; 10/96

C:\Users\Sondra.Wouch\Documents\BNA\Michigan ROP Renewal\BNA Homer Disc Plant - Updated PTE Calcs 12-11-19

Table B-4
BNA Homer Disc Plant
Additional Exempt Paint Booth PTE Calculations
12/11/2019

Rule 290(2)(a) - maximum of 1,000 lb/mo uncontrolled air contaminant emissions.

1,000 lb/mo

12,000 lb/yr

6.00 ton/yr HAP or VOC for each WL or Prototype paint booth

#### Notes:

Applicable to any paint used.

Maximum paint usage per month for each paint type, based on 1,000 lb/mo uncontrolled air contaminant emissions:

Zinc: 359.71 gal/mo Geomet 360: 625.00 gal/mo Magni C40: 384.62 gal/mo Geomet 1102: 1136.36 gal/mo



2018 MAERS Submittal



### Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Source Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERI	ENCE					
Form Type	Source		AQD Source	ID (SRN)	N6226	
			<b>!</b>			
SOURCE IDEN	ITIFICATION					
Source Name	Brembo I	North America, Inc.				
NAICS Code	336340		Portable		No	
Physical Addres	ss (Street Address 1)		<b>-</b>	29991 M 6	0 EAST	
Physical Addres	ss (Street Address 2)					
County	CALHOUN	City	HOMER	Zip Code	4924	5-
Latitude	42.162978 Decimal	Degrees	Longitude		-84.713415 D	Decimal Degrees
Horizontal Colle	ction Method	004				
Source Map Sca	ale Number		Horizontal Ad	ccuracy Measi	ure <b>25 M</b>	eters
Horizontal Refer	rence Datum Code	02	Reference F	oint Code	101	
Principal Produ	ct Disc Brak	ke Rotors		Number of	Employees	340
Employer Fede	ral Identification Number	954190804	ļ	I		
OWNER INFOR	RMATION					
Owner Name		North America, Inc.				
Mailing Address	s (Street Address 1)	·	47765 Halya	ırd Dr.		
Mailing Address	s (Street Address 2)					
City	Plymouth		State/Pro vin	се	MI	
Country	USA		Zip or Postal	Code	48170-	



FORM REFERENCE

### Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

### 2018 Contact Form

Form Type	Contact	AQD Sou	rce ID (SRN)	N6226			
EMISSION INVENTORY C	CONTACT (PRIMARY	) INFORMA	TION				
Contact First Name, Middle	Initial	Jessy	Jessy		st Name	Conard	
Contact Title	HSE Manager			•			
Mailing Address (Street Add	dress 1)		6259 30 Mi	le Road			
Mailing Address (Street Add	dress 2)						
City <b>HOMER</b>	State/Province	MI	Country	USA	Zip Code	49245	
E-Mail Address (if available)	jcona	ard@us.bre	mbo.com				
Telephone Number		Telephone Extension					
Fax Number	()		·				
EMISSION INVENTORY	CONTACT (SECOND	ARY) INFO	RMATION				
Contact First Name, Middle		Chris		Contact La	ast Name	Blume	
Contact Title	Vice President						
Mailing Address (Street Add	dress 1)		RPS				
Mailing Address (Street Add	dress 2)		135 S. LaS	alle Street, S	uite 3500		
City Chicago	State/Province	IL	Country	USA	Zip Code	60603	
on, omougo	Grato, From Se				1		
E-Mail Address (if available)		topher.blur	ne@rpsgroup	o.com			
		topher.blur	me@rpsgroup  Telephone				



### Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

### **2018 Contact Form**

FORM REFERENCE							
Form Type	Contact	AQD Source ID (SRN)		N6226			
		•					
FEE INVOICE CONTACT IN	FORMATION (Fee	Subject Fac	ilities Only)				
Contact First Name, Middle Ini	tial	MARK		Contact L	ast Name	KENWORTHY	
Contact Title	HSE Manager			1			
Mailing Address (Street Addre	ss 1)		29991 M 60	EAST			
Mailing Address (Street Addre	ss 2)						
City <b>HOMER</b>	State/Province	MI	Country	USA	Zip Code	49245	
E-Mail Address (if available)	mker	nworthy@us	s.brembo.con	า			
Telephone Number	(517) 5684398		Telephone	Extension		6213	
Fax Number	()		-				



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

### 2018 Stack Form

FORM REFERENCE						
Form Type	Stack		AQD Source	e ID (SRN) <b>N6226</b>		
STACK IDENTIFICATION						
AQD Stack ID	SV0011		Stack ID	SV-Geo		
Dismantle Date (MM/DD/YY)	YY)		l			
Stack Description		[Disc P	lant] (Paint	Booth - SV0042), EU	-GeoMet-01	
Actual Stack Height Above Ground	40	feet		Inside Stack Diameter	20	inches
Exit Gas Temperature	80.7	degrees	Fahrenheit	Actual Exit Gas Flow R	ate 13630	cubic feet per minute

Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter	20		inches	
Exit Gas Temperature	80.7	degrees Fahrenheit	Actual Exit Ga	as Flow Rate	13630		cubic f	eet per minute
Stack Orientation Vertical Exit Velocity of Gas (in feet per second): 104.126								
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude		-84.7169		Decim	al Degrees
Horizontal Collection Method	004	Source Map Scale Number		Horizontal A	ccuracy Meas	sure	25	Meters
Horizontal Reference Datum	Code	02	Reference Po	int Code		101		
Bypass Stack Only		N	If yes, Stack II	D of main stacl	K			



Bypass Stack Only

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### Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

FORM REFERENCE					
Form Type	Stack	AQD So	urce ID (SRN)	N6226	
STACK IDENTIFICATION					
AQD Stack ID	SV0012	Stack ID	)	SV-GeoMet-02	
Dismantle Date (MM/DD/YY)	YY)	•			
Stack Description [Disc Plant] (Paint			int Booth - SV00	43), EU-GeoMet-01	
Actual Stack Height Above Ground	40	feet	Inside Stack [	Diameter 20	inches
Exit Gas Temperature	82.1	degrees Fahrenhe	it Actual Exit Ga	as Flow Rate 13630	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity of	of Gas (in feet per second): 104.	126
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scal Number	e	Horizontal Accuracy Measure	25 Meters



Bypass Stack Only

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### Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

FORM REFERENCE							
Form Type	Stack	AQD Source	e ID (SRN)	N6226			
	1	•					
STACK IDENTIFICATION							
AQD Stack ID	SV0013	Stack ID		SV-GeoMet-03			
Dismantle Date (MM/DD/YY)	YY)						
Stack Description	Stack Description [Disc Plant] (Cure Station Exhaust - SV0045), EU-GeoMet-01						
Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter 20	inches		
Exit Gas Temperature	122.3	degrees Fahrenheit	Actual Exit Ga	s Flow Rate 3261	cubic feet per minute		
Stack Orientation	Vertical		Exit Velocity o	f Gas (in feet per second): 24.9	9122		
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees		
Horizontal Collection Method	004	Source Map Scale Number	•	Horizontal Accuracy Measure	25 Meters		



Bypass Stack Only

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### Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

FORM REFERENCE					
Form Type	Stack	AQD Source	e ID (SRN)	N6226	
		•			
STACK IDENTIFICATION					
AQD Stack ID	SV0014	Stack ID		SV-GeoMetII-01	
Dismantle Date (MM/DD/YY)	YY)				
Stack Description		[Disc Plant] (Paint	Booth - SV00	53), EU-GeoMet-02	
Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter 20	inches
Exit Gas Temperature	78.4	degrees Fahrenheit	Actual Exit Ga	as Flow Rate 13630	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity of	of Gas (in feet per second): 104.1	126
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number	•	Horizontal Accuracy Measure	25 Meters



Bypass Stack Only

### Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE								
Form Type	Stack	,	AQD Source	D (SRN)	N6226			
		•						
STACK IDENTIFICATION								
AQD Stack ID	SV0015		Stack ID		SV-GeoMe	tII-02		
Dismantle Date (MM/DD/YY	YY)	•						
Stack Description		[Disc Pla	nt] (Paint	Booth - SV00	54) EU-Geo	Met-02		
Actual Stack Height Above Ground	40	feet		Inside Stack D	Diameter	20	inches	
Exit Gas Temperature	78.2	degrees F	ahrenheit	Actual Exit Ga	s Flow Rate	13630	cubic feet pe	er minute
Stack Orientation	Vertical			Exit Velocity o	f Gas (in feet	per second): 104.1	26	
Latitude <b>42.1635</b>	4	Decimal D	egrees	Longitude		-84.7169	Decimal De	grees
Horizontal Collection Method	004	Source M	lap Scale		Horizontal	Accuracy Measure	25	Meters

Number

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Bypass Stack Only

### Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE					
Form Type	Stack	AQD Source	AQD Source ID (SRN) N6226		
STACK IDENTIFICATION					
AQD Stack ID	SV0016	Stack ID	SV-GeoMetII-03		
Dismantle Date (MM/DD/YY)	YY)				
Stack Description [Disc Plant] (Cure Station Exhaust - SV0056), EU-GeoMet-02					
Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter 20	inches
Exit Gas Temperature	84.8	degrees Fahrenheit	Actual Exit Ga	as Flow Rate 7500	cubic feet per minute
Stack Orientation Vertical			Exit Velocity of Gas (in feet per second): 57.2958		
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale		Horizontal Accuracy Measure	25 Meters

Number

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#### 2018 Stack Form

FORM REFERENCE			
Form Type	Stack	AQD Source ID (SRN)	N6226

AQD Stack ID	SV0017	Stack ID		SV-Sprimag	Black		
Dismantle Date (MM/DD/YY)	YY)	•					
Stack Description		[Disc Plant] (Ex	haust - SV0021)	, EU-Black (S	primag Black)		
Actual Stack Height Above Ground	40	feet	Inside Stack	Diameter	20	inches	
Exit Gas Temperature	80.7	degrees Fahrenhei	t Actual Exit G	Actual Exit Gas Flow Rate 4708		cubic feet per minute	
Stack Orientation	Vertical		Exit Velocity	of Gas (in feet p	er second): 35.96	65	
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude		-84.7169	Decima	l Degrees
Horizontal Collection Method	004	Source Map Scale Number	e	Horizontal A	ccuracy Measure	25	Meters
Horizontal Reference Datum	Code	02	Reference Po	oint Code	101		
Bypass Stack Only		N	If yes, Stack	ID of main stack	(		



Bypass Stack Only

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# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

FORM REFERENCE					
Form Type	Stack	AQD Source	ID (SRN)	N6226	
	'	<b>'</b>			
STACK IDENTIFICATION					
AQD Stack ID	SV0018	Stack ID		SV-Magni-01	
Dismantle Date (MM/DD/YY)	YY)				
Stack Description		[Disc Plant] (Exhau	ıst - SV0052),	EU-Magni-01	
Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter 20	inches
Exit Gas Temperature	72.9	degrees Fahrenheit	Actual Exit Ga	s Flow Rate 4500	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity o	f Gas (in feet per second): 34.37	75
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number		Horizontal Accuracy Measure	25 Meters



Bypass Stack Only

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# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

FORM REFERENCE					
Form Type	Stack	AQD Source	ID (SRN)	N6226	
	11	•			
STACK IDENTIFICATION					
AQD Stack ID	SV0020	Stack ID		SV-Magni-03	
Dismantle Date (MM/DD/YY)	YY)	•			
Stack Description		[Disc Plant] (Exhau	ıst - SV0063),	EU-Magni-03	
Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter 20	inches
Exit Gas Temperature	72.9	degrees Fahrenheit	Actual Exit Ga	s Flow Rate 4500	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity o	f Gas (in feet per second): 34.37	75
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number		Horizontal Accuracy Measure	25 Meters



Bypass Stack Only

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# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

FORM REFERENCE					
Form Type	Stack	AQD Source	e ID (SRN)	N6226	
		•			
STACK IDENTIFICATION					
AQD Stack ID	SV0021	Stack ID		SV-Magni-04	
Dismantle Date (MM/DD/YY)	YY)	•			
Stack Description		[Disc Plant] (Exhau	ust - SV0064),	EU-Magni-01	
Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter 20	inches
Exit Gas Temperature	72.9	degrees Fahrenheit	Actual Exit Ga	as Flow Rate 4500	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity o	f Gas (in feet per second): 34.37	75
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number	•	Horizontal Accuracy Measure	25 Meters



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

If yes, Stack ID of main stack

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
TORW KEI EKENGE						
Form Type	Stack	AQD Source	e ID (SRN)	N6226		
STACK IDENTIFICATION						
AQD Stack ID	SV0023	Stack ID		SV-Zinc-01		
Dismantle Date (MM/DD/YY)	YY)	•				
Stack Description		[Disc Plant] (Exha	ust - SV0026),	EU-Zinc-01		
Actual Stack Height Above Ground	40	feet	Inside Stack	Diameter	20	inches
Exit Gas Temperature	95.6	degrees Fahrenheit	Actual Exit G	as Flow Rate	4708	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity	of Gas (in feet p	er second): 35.96	65
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude		-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number	1	Horizontal Ad	ccuracy Measure	25 Meters
Horizontal Reference Datum	Code	02	Reference Po	oint Code	101	



#### 2018 Stack Form

FORM REFERENC	E			
Form Type	Stack	AQD Source ID (SRN)	N6226	
			"	
STACK IDENTIFIC	ATION			

AQD Stack ID	SV0024	Stack ID		SV-Zn-Sprimag-01			
Dismantle Date (MM/DD/YY)	YY)	•					
Stack Description		[Disc Plant] (Spra	y Station - SV	0022), EU-Zinc-02 (Sprir	nag Zinc)		
Actual Stack Height Above Ground	40	feet	Inside Stack [	Diameter 20	i	inches	
Exit Gas Temperature	78.1	degrees Fahrenheit	Actual Exit Gas Flow Rate 4708		(	cubic feet per minute	
Stack Orientation	Vertical		Exit Velocity of	of Gas (in feet per second):	35.9665		
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	ı	Decimal	Degrees
Horizontal Collection Method	004	Source Map Scale Number		Horizontal Accuracy Mea	sure ;	25	Meters
Horizontal Reference Datum	Code	02	Reference Po	int Code	101		
Bypass Stack Only		N	If yes, Stack I	D of main stack			



#### 2018 Stack Form

Form Type Stack AQD So	urce ID (SRN) N6226	

AQD Stack ID	SV0025	Stack ID		SV-Zn-Spri	mag-02		
Dismantle Date (MM/DD/YY)	YY)	<u>'</u>					
Stack Description		[Disc Plant] (Flas	sh Off - SV0023	), EU-Zinc-02	2 (Sprimag Zinc)		
Actual Stack Height Above Ground	40	feet	Inside Stack	Diameter	20	inches	
Exit Gas Temperature	81.9	degrees Fahrenheit	Actual Exit G	Actual Exit Gas Flow Rate 1177		cubic feet per minute	
Stack Orientation	Vertical		Exit Velocity	of Gas (in feet	per second): <b>8.991</b>	62	
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude		-84.7169	Decima	l Degrees
Horizontal Collection Method	004	Source Map Scale Number	•	Horizontal A	Accuracy Measure	25	Meters
Horizontal Reference Datum	Code	02	Reference Po	oint Code	101		
Bypass Stack Only		N	If yes, Stack	ID of main stac	k		



# 2018 Stack Form

FORM REFERENCE			
Form Type	Stack	AQD Source ID (SRN)	N6226

AQD Stack ID	SV0026	Stack ID		SV-Zn-Spr	rimag-03		
Dismantle Date (MM/DD/YY)	YY)						
Stack Description		[Disc Plant] (Coo	ling Zone - SV	0025), EU-Zi	inc-02 (Sprimag Zii	nc)	
Actual Stack Height Above Ground	40	feet	Inside Stack	Diameter	20	inches	
Exit Gas Temperature	85.5	degrees Fahrenheit	Actual Exit G	Actual Exit Gas Flow Rate 11770		cubic feet per minute	
Stack Orientation	Vertical		Exit Velocity	of Gas (in feet	t per second): 89.91	62	
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude		-84.7169	Decima	l Degrees
Horizontal Collection Method	004	Source Map Scale Number	•	Horizontal	Accuracy Measure	25	Meters
Horizontal Reference Datum	Code	02	Reference Po	oint Code	101		
Bypass Stack Only		N	If yes, Stack	ID of main sta	ck		



Bypass Stack Only

# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type	Stack	AQD Source	e ID (SRN)	N6226		
		•				
STACK IDENTIFICATION	I					
AQD Stack ID	SV0027	Stack ID		SV-Zn-Brentro-01		
Dismantle Date (MM/DD/YY	YY)	•				
Stack Description [Disc Plant] (Exhaust - SV0048), EU-Zinc-03 (Brentro 01)						
Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter 20	inches	
Exit Gas Temperature	82.2	degrees Fahrenheit	Actual Exit Ga	s Flow Rate 5900	cubic feet per minute	
Stack Orientation	Vertical		Exit Velocity of Gas (in feet per second): 45.0727			
Latitude <b>42.163</b>	54	Decimal Degrees	Longitude	-84.7169	Decimal Degrees	
Horizontal Collection Metho	d <b>004</b>	Source Map Scale	•	Horizontal Accuracy Measure	25 Meters	

Number

02



Horizontal Collection Method 004

Horizontal Reference Datum Code

Bypass Stack Only

# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

Horizontal Accuracy Measure

25

101

Meters

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE					
Form Type	Stack	AQD Source	e ID (SRN) <b>N6226</b>		
STACK IDENTIFICATION	1				
AQD Stack ID	AQD Stack ID SV0028 S		SV-Zn-Br	entro-02	
Dismantle Date (MM/DD/YY	YY)	•			
Stack Description		[Disc Plant] (Exha	ust - SV0059), EU-Zinc-0	04 (Brentro 02)	)
Actual Stack Height Above Ground	40	feet	Inside Stack Diameter	20	inches
Exit Gas Temperature	79.7	degrees Fahrenheit	Actual Exit Gas Flow Rate	<b>5900</b>	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity of Gas (in fee	et per second):	45.0727
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees

Source Map Scale

Number

02



#### 2018 Stack Form

FORM REFERENCE			
Form Type	Stack	AQD Source ID (SRN)	N6226

AQD Stack ID	SV0029	Stack ID		SV-Blechtopf-01		
Dismantle Date (MM/DD/YY)	YY)	•				
Stack Description		[Disc Plant] (Spray	/ Station - SV0	0061), EU-Zinc-05-Blechtopf		
Actual Stack Height Above Ground	40	feet	Inside Stack D	Diameter 20	inches	
Exit Gas Temperature	72.9	degrees Fahrenheit	Actual Exit Ga	as Flow Rate 4400	cubic feet per minute	
Stack Orientation	Vertical		Exit Velocity of Gas (in feet per second): 33.6135			
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	Decimal Degrees	
Horizontal Collection Method	004	Source Map Scale Number	•	Horizontal Accuracy Measure	25 Meters	
Horizontal Reference Datum Code 02			Reference Point Code 101			
Bypass Stack Only N			If yes, Stack ID of main stack			



#### 2018 Stack Form

FORM REFERENCE							
Form Type	Stack	AQD Source ID (SRN)	N6226				
		·					
STACK IDENTIFIC	ATION						

AQD Stack ID	SV0030	Sta	ick ID		SV-Blecht	opf-02		
Dismantle Date (MM/DD/YY)	YY)	t						
Stack Description		[Disc Plant]	(Drying	g Area - SV00	62) EU-Zin	c-05-Blechtopf		
Actual Stack Height Above Ground	40	feet		Inside Stack [	Diameter	20	inches	
Exit Gas Temperature	72.9	degrees Fahr	enheit	Actual Exit Gas Flow Rate 150		150	cubic feet per minute	
Stack Orientation	Vertical			Exit Velocity of	of Gas (in fee	t per second): 1.145	92	
Latitude <b>42.1635</b>	4	Decimal Degr	ees	Longitude		-84.7169	Decima	l Degrees
Horizontal Collection Method	004	Source Map Number	Scale		Horizontal	Accuracy Measure	25	Meters
Horizontal Reference Datum Code 02				Reference Point Code 101				
Bypass Stack Only N			If yes, Stack ID of main stack					



Bypass Stack Only

# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

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FORM REFERENCE								
Form Type	Stack		AQD Source	ID (SRN)	N6226			
STACK IDENTIFICATION								
AQD Stack ID	SV0031		Stack ID		SV-GeoMe	t-III-01		
Dismantle Date (MM/DD/YY)	YY)	•						
Stack Description		[Disc Pla	ant] (Paint	Booth - SV006	66) EU-Geo	Met-III		
Actual Stack Height Above Ground	40	feet		Inside Stack D	iameter	20	inches	
Exit Gas Temperature	72.9	degrees F	ahrenheit	Actual Exit Ga	s Flow Rate	4500	cubic feet	per minute
Stack Orientation	Vertical			Exit Velocity o	f Gas (in feet	per second): <b>34.37</b>	775	
Latitude <b>42.1635</b>	4	Decimal D	Degrees	Longitude		-84.7169	Decimal [	Degrees
Horizontal Collection Method	004	Source I	Map Scale	I .	Horizontal A	Accuracy Measure	25	Meters

Number

02



Bypass Stack Only

# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

Reference Point Code

If yes, Stack ID of main stack

101

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE								
Form Type	Stack		AQD Source	ID (SRN)	N6226			
		•						
STACK IDENTIFICATION								
AQD Stack ID	SV0032		Stack ID		SV-GeoMe	t-III-02		
Dismantle Date (MM/DD/YY)	YY)	•						
Stack Description		[Disc PI	ant] (Induc	tor - SV0067)	EU-GeoMet	-III		
Actual Stack Height Above Ground	40	feet		Inside Stack D	iameter	20	inches	
Exit Gas Temperature	82.1	degrees	Fahrenheit	Actual Exit Ga	s Flow Rate	5400	cubic fee	t per minute
Stack Orientation	Vertical			Exit Velocity o	f Gas (in feet	per second): <b>41.25</b>	3	
Latitude <b>42.1635</b>	4	Decimal I	Degrees	Longitude		-84.7169	Decimal	Degrees
Horizontal Collection Method	004	Source	Map Scale		Horizontal	Accuracy Measure	25	Meters

Number

02



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

If yes, Stack ID of main stack

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FORM REFERENCE						
Form Type	Stack	AQD Sou	rce ID (SRN)	N6226		
		•				
STACK IDENTIFICATION						
AQD Stack ID	SV0039	Stack ID		SV0046		
Dismantle Date (MM/DD/YY)	YY)	_				
Stack Description		[Disc Plant] SV0	046 (Induction	Exhaust, EU-GeoN	let-01)	
Actual Stack Height Above Ground	40	feet	Inside Stack	Diameter 20		inches
Exit Gas Temperature	94.8	degrees Fahrenheit	Actual Exit G	as Flow Rate 1667		cubic feet per minute
Stack Orientation	Vertical		Exit Velocity	of Gas (in feet per sec	ond): <b>12.73</b>	49
Latitude 42.1635	4	Decimal Degrees	Longitude	-84.7	169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number		Horizontal Accurac	y Measure	25 Meters
Horizontal Reference Datum	Code	02	Reference P	oint Code	101	



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

If yes, Stack ID of main stack

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type	Stack	AQD Sou	rce ID (SRN)	N6226		
		•				
STACK IDENTIFICATION						
AQD Stack ID	SV0040	Stack ID		SV0047		
Dismantle Date (MM/DD/YY)	YY)					
Stack Description		[Disc Plant] SV0	047 (Induction	Exhaust, EU-GeoMet	01)	
Actual Stack Height Above Ground	40	feet	Inside Stack	Diameter 20		inches
Exit Gas Temperature	113.9	degrees Fahrenheit	Actual Exit G	as Flow Rate 1667		cubic feet per minute
Stack Orientation	Vertical		Exit Velocity	of Gas (in feet per secon	d): <b>12.73</b> 4	49
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude	-84.7169	)	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number		Horizontal Accuracy N	1easure	25 Meters
Horizontal Reference Datum	Code	02	Reference P	oint Code	101	



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

If yes, Stack ID of main stack

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FORM REFERENCE						
Form Type	Stack	AQD Sourc	e ID (SRN)	N6226		
7,7			- (- ,			
074 01/ IDENTIFICATION						
STACK IDENTIFICATION						
AQD Stack ID	SV0041	Stack ID		SV0057		
Dismantle Date (MM/DD/YY)	YY)	•				
Stack Description		[Disc Plant] SV005	7 (Induction E	Exhaust, EU	-GeoMet-02)	
Actual Stack Height Above Ground	40	feet	Inside Stack I	Diameter	20	inches
Exit Gas Temperature	107.4	degrees Fahrenheit	Actual Exit Ga	as Flow Rate	1750	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity of	of Gas (in feet	per second): <b>13.369</b>	)
Latitude <b>42.1635</b>	4	Decimal Degrees	Longitude		-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number		Horizontal A	Accuracy Measure	25 Meters
Horizontal Reference Datum	Code	02	Reference Po	oint Code	101	



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

If yes, Stack ID of main stack

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FORM REFERENCE						
Form Type	Stack	AQD S	ource ID (SRN)	N6226		
		•				
STACK IDENTIFICATION						
AQD Stack ID	SV0042	Stack I	D	SV0058		
Dismantle Date (MM/DD/YY)	YY)	•				
Stack Description		[Disc Plant] S\	/0058 (Induction	on Exhaust, EU	I-GeoMet-02)	
Actual Stack Height Above Ground	40	feet	Inside Sta	ack Diameter	20	inches
Exit Gas Temperature	77.7	degrees Fahrenh	eit Actual Ex	it Gas Flow Rate	1750	cubic feet per minute
Stack Orientation	Vertical		Exit Velo	city of Gas (in feet	per second): 13.36	9
Latitude 42.1635	4	Decimal Degrees	Longitude	)	-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Sca Number	ale	Horizontal	Accuracy Measure	25 Meters
Horizontal Reference Datum	Code	02	Referenc	e Point Code	101	



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

If yes, Stack ID of main stack

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type	Stack	AQD Soul	rce ID (SRN)	N6226		
		·				
STACK IDENTIFICATION						
AQD Stack ID	SV0043	Stack ID		SV0065		
Dismantle Date (MM/DD/YY)	YY)	•				
Stack Description		[Disc Plant] SV00	065 (Exhaust, E	EU-Magni-05	)	
Actual Stack Height Above Ground	40	feet	Inside Stack	Diameter	20	inches
Exit Gas Temperature	72.8	degrees Fahrenheit	Actual Exit G	Sas Flow Rate	4500	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity	of Gas (in feet	per second): <b>34.37</b>	75
Latitude 42.1635	4	Decimal Degrees	Longitude		-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number	•	Horizontal	Accuracy Measure	25 Meters
Horizontal Reference Datum	Code	02	Reference P	oint Code	101	



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

#### 2018 Stack Form

If yes, Stack ID of main stack

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FORM REFERENCE						
Form Type	Stack	AQD Sou	rce ID (SRN)	N6226		
STACK IDENTIFICATION						
AQD Stack ID	SV0044	Stack ID		SV0068		
Dismantle Date (MM/DD/YY)	YY)	•				
Stack Description		[Disc Plant] SV0	068 (Exhaust, I	EU-Magni-02	)	
Actual Stack Height Above Ground	40	feet	Inside Stack	Diameter	20	inches
Exit Gas Temperature	82.1	degrees Fahrenheit	Actual Exit G	Sas Flow Rate	4500	cubic feet per minute
Stack Orientation	Vertical		Exit Velocity	of Gas (in feet	per second): <b>34.37</b>	75
Latitude 42.1635	4	Decimal Degrees	Longitude		-84.7169	Decimal Degrees
Horizontal Collection Method	004	Source Map Scale Number	•	Horizontal	Accuracy Measure	24 Meters
Horizontal Reference Datum	Code	02	Reference P	oint Code	101	



#### 2018 Emission Unit Form

FORM REFERENCE					
Form Type Emissi	ion Unit		AQD Source	ce ID (SRN) <b>N6226</b>	
EMISSION UNIT IDENTIFIC	CATION				
AQD Emission Unit ID	EU0014		EU ID	EU-GeoMe	t-01
NAICS Code (if different from	om Source Form)		336340		
Installation Date MM/DD/Y	YYY	09/01/2	009	Dismantle Date MM/DD/YYY	ΥΥ
Emission Unit Description - Control Devices)	(Include Process	Equipme	ent and	to multiple surfaces of a are used to collect any o	-01) - HVLP spray guns apply coating utomotive brake products. Dry filters verspray. One booth applies paint. ated in a drying oven before moving
Emission Unit Type				Spray Booth or Coating I	Line
Is this a combustion source	?			N	
Is this combustion source u	ised to generate e	electricity'	?		
Design Capacity Design Capacity Nu		merator Design Capacity Denominator			
Maximum Nameplate Capa	ncity				Megawatts
RULE 201 APPLICABI	LITY				
Grandfathered?	N				
Exempt from Rule 201?	N		If Yes, Rul	e Number	
If Rule 201 Exempt, Is Thro	oughput Below Re	porting T	hresholds?		
Permit? Y			If Yes, Ent	er the Permit Number	145-12B
Is This Emission Unit Requ	ired To Report Er	missions <sup>-</sup>	To MAERS F	or This Reporting Year?	Υ
			CONTR	OL DEVICE(S)	
				0_0_	
		l	EMISSION	I UNIT STACK(S)	
22. Stack ID	SV-Ged	oMet-01			
22. Stack ID	SV-Ged	oMet-02			
22. Stack ID	SV-Ged	oMet-03			
22. Stack ID	SV0046	6			
22. Stack ID	SV0047	7			



# 2018 Emission Unit Form

FORM REFERENCE							
Form Type <b>Emissi</b>	ion Unit		AQD Sour	ce ID (SRN)	N6226		
EMISSION UNIT IDENTIFIC	CATION						
AQD Emission Unit ID	EU0015		EU ID		EU-GeoMet	-02	
NAICS Code (if different from	om Source Form)		336340				
Installation Date MM/DD/Y	YYY	11/01/20	011	Dismantle D	ate MM/DD/YYY	Υ	
Emission Unit Description - Control Devices)	(Include Process	Equipme	nt and	to multiple are used to	surfaces of au collect any ov rotors are hea	02) - HVLP spray guns itomotive brake produ verspray. One booth a ated in a drying oven l	cts. Dry filters applies paint.
Emission Unit Type				Spray Boot	h or Coating L	ine	
Is this a combustion source	?			N			
Is this combustion source u	used to generate e	electricity?	•				
Design Capacity Design Capacity Nur			umerator Design Capacity Denominator		inator		
Maximum Nameplate Capa	acity					Megawatts	
RULE 201 APPLICABI	ILITY						
Grandfathered?	N						
Exempt from Rule 201?	N		If Yes, Ru	le Number			
If Rule 201 Exempt, Is Thro	oughput Below Re	porting TI	nresholds?				
Permit? Y			If Yes, Ent	ter the Permit Nu	ımber	145-12B	
Is This Emission Unit Requ	ired To Report En	nissions T	o MAERS F	or This Reportir	ng Year?	Y	
			CONTR	OL DEVICE(	S)		
					-,		
		E	EMISSION	N UNIT STAC	K(S)		
22. Stack ID	SV-Geo	MetII-01					
22. Stack ID	SV-Geo	MetII-02	2				
22. Stack ID	SV-Geo	MetII-03	3				
22. Stack ID	SV0057	•					
22. Stack ID	SV0058	3					



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE							
Form Type Emission Unit	AQD Source	e ID (SRN) <b>N6226</b>					
	•						
EMISSION UNIT IDENTIFICATION							
AQD Emission Unit ID <b>EU0016</b>	EU ID	EU-Black	k (Sp)				
NAICS Code (if different from Source Form)	336340						
Installation Date MM/DD/YYYY (	Dismantle Date MM/DD/Y	YYY					
Emission Unit Description - (Include Process Equipment and Control Devices)  [Disc Plant] (EU-Black (Sprimag Black)) - Brake rotors of drums are pre-heated using a single induction unit and spray guns apply coating to multiple surfaces of autom brake products. Dry filters are used to collect any over A paint booth applies product to surfaces, then brake products enter a flash-off to dry/cure.							
Emission Unit Type		Spray Booth or Coatin	g Line				
Is this a combustion source?		N					
Is this combustion source used to generate ele	ectricity?						
Design Capacity	Design Capacity Nu	merator	Design Capacity Denominator				
Maximum Nameplate Capacity			Megawatts				
RULE 201 APPLICABILITY							
Grandfathered?							
Exempt from Rule 201? N	If Yes, Rul	e Number					
If Rule 201 Exempt, Is Throughput Below Rep	orting Thresholds?						
Permit? Y	If Yes, Ent	er the Permit Number	145-12B				
Is This Emission Unit Required To Report Emi	ssions To MAERS F	or This Reporting Year?	Y				
	001170	OL DE\//OE/O\					
	CONTROL DEVICE(S)						
	EMISSION	UNIT STACK(S)					

SV-SprimagBlack



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type Emission Unit	AQD Source	ce ID (SRN) <b>N6226</b>				
	·					
EMISSION UNIT IDENTIFICATION						
AQD Emission Unit ID <b>EU0017</b>	EU ID	EU-Zind	:-01			
NAICS Code (if different from Source Form	336340					
Installation Date MM/DD/YYYY	02/01/2001	Dismantle Date MM/DD/	YYYY			
Emission Unit Description - (Include Process Equipment and Control Devices)  [Disc Plant] (EU-Zinc-01) - Brake rotors or drums are preheated using a single induction unit and HVLP spray guns apply coating to multiple surfaces of automotive brake products. Dry filters are used to collect any overspray. A paint booth applies product to surfaces, then brake products enter a flash-off to dry/cure.						
Emission Unit Type		Spray Booth or Coati	ng Line			
Is this a combustion source?		N				
Is this combustion source used to generate	electricity?					
Design Capacity	Design Capacity Nu	merator	Design Capacity Denominator			
Maximum Nameplate Capacity			Megawatts			
RULE 201 APPLICABILITY						
Grandfathered?						
Exempt from Rule 201? N	If Yes, Rul	e Number				
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?						
Permit? Y If Yes, Enter the Permit Number 145-12B						
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?						
CONTROL DEVICE(S)						
		. ,				
	EMISSION	I UNIT STACK(S)				

SV-Zinc-01



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE	NCE				
Form Type	Emission Unit	AQD Source	ce ID (SRN)	N6226	
		•			
EMISSION UNIT I	DENTIFICATION				
AQD Emission U	nit ID EU0018	EU ID		EU-Zinc-02	
NAICS Code (if d	ifferent from Source Form)	336340			
Installation Date I	MM/DD/YYYY	07/01/2006	Dismantle Dat	e MM/DD/YYY	Y
Emission Unit Description - (Include Process Equipment and Control Devices)			[Disc Plant] (EU-Zinc-02 (Sprimag Zinc)) - Brake rotors or drums are pre-heated using a single induction unit and HVLP spray guns apply coating to multiple surfaces of automotive brake products. Dry filters are used to collect any overspray. A paint booth applies product to surfaces, then brake products enter a flash-off to dry/cure.		
Emission Unit Typ	ое		Spray Booth	or Coating L	ine
Is this a combusti	on source?		N		
Is this combustion	n source used to generate	electricity?			
Design Capacity		Design Capacity Nu	merator Design Capacity Denominator		Design Capacity Denominator
Maximum Namep	late Capacity	•			Megawatts
RULE 201 APF	PLICABILITY				
Grandfathered?	N				
Exempt from Rule	e 201? <b>N</b>	If Yes, Rul	le Number		
If Rule 201 Exem	pt, Is Throughput Below R	eporting Thresholds?			
Permit?	Υ	If Yes, Ent	ter the Permit Num	nber	145-12B
Is This Emission	Unit Required To Report E	missions To MAERS F	For This Reporting	Year?	Υ
		CONTR	OL DEVICE(S	)	
				,	
		EMISSION	NUNIT STACK	(S)	
22. Stack ID	SV-Zn	-Sprimag-01			
22. Stack ID	SV-Zn	-Sprimag-02			

SV-Zn-Sprimag-03



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type Emission Unit	AQD Source	e ID (SRN) <b>N6226</b>				
EMISSION UNIT IDENTIFICATION						
AQD Emission Unit ID <b>EU0019</b>	EU ID	EU-Zinc-	03			
NAICS Code (if different from Source Form)	336340					
Installation Date MM/DD/YYYY	07/01/2006	Dismantle Date MM/DD/Y	YYY			
Emission Unit Description - (Include Process Equipment and Control Devices)  [Disc Plant] (EU-Zinc-03 (Brentro 01)) - Brake rotors or druit are pre-heated using a single induction unit and HVLP spraguns apply coating to multiple surfaces of automotive brake products. Dry filters are used to collect any overspray. A paint booth applies product to surfaces, then brake product enter a flash-off to dry/cure.						
Emission Unit Type		Spray Booth or Coating	g Line			
Is this a combustion source?		N				
Is this combustion source used to generate e	electricity?					
Design Capacity	Design Capacity Nu	merator	Design Capacity Denominator			
Maximum Nameplate Capacity			Megawatts			
RULE 201 APPLICABILITY						
Grandfathered? N						
Exempt from Rule 201? N	If Yes, Rule	e Number				
If Rule 201 Exempt, Is Throughput Below Re	eporting Thresholds?					
Permit? Y	If Yes, Ente	er the Permit Number	145-12B			
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?						
CONTROL DEVICE(S)						
	EMISSION	UNIT STACK(S)				

SV-Zn-Brentro-01



# 2018 Emission Unit Form

FORM REFERENCE					
Form Type Emission Unit	AQD Source	e ID (SRN) <b>N6226</b>			
EMISSION UNIT IDENTIFICATION					
AQD Emission Unit ID <b>EU0020</b>	EU ID	EU-Zinc-04	ı		
NAICS Code (if different from Source Form)	336340				
Installation Date MM/DD/YYYY	05/01/2009	Dismantle Date MM/DD/YY	YY		
Emission Unit Description - (Include Process Control Devices)	Equipment and	[Disc Plant] (EU-Zinc-04 (Brentro 02)) - Brake rotors or drums are pre-heated using a single induction unit and HVLP spray guns apply coating to multiple surfaces of automotive brake products. Dry filters are used to collect any overspray. A paint booth applies product to surfaces, then brake products enter a flash-off to dry/cure.			
Emission Unit Type		Spray Booth or Coating	Line		
Is this a combustion source?		N			
Is this combustion source used to generate e	lectricity?				
Design Capacity	Design Capacity Nur	nerator Design Capacity Denominator			
Maximum Nameplate Capacity			Megawatts		
RULE 201 APPLICABILITY					
Grandfathered?					
Exempt from Rule 201? N	If Yes, Rule	Number			
If Rule 201 Exempt, Is Throughput Below Re	porting Thresholds?				
Permit? Y	If Yes, Ente	er the Permit Number	145-12B		
Is This Emission Unit Required To Report Em	nissions To MAERS Fo	or This Reporting Year?	Υ		
CONTROL DEVICE(S)					
	FMISSION	UNIT STACK(S)			
22. Stack ID SV-Zn-E	Brentro-02				



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE				
Form Type Emission Unit	AQD Sour	rce ID (SRN) <b>N6226</b>		
	·			
EMISSION UNIT IDENTIFICATION				
AQD Emission Unit ID <b>EU0021</b>	EU ID	EU-Zinc-	05	
NAICS Code (if different from Source Fo	orm) 336340			
Installation Date MM/DD/YYYY	YYYY			
Emission Unit Description - (Include Pro Control Devices)	cess Equipment and	[Disc Plant] (EU-Zinc-05-Blechtopf) - Brake rotors or drums are pre-heated using a single induction unit and HVLP spray guns apply coating to multiple surfaces of automotive brake products. Dry filters are used to collect any overspray. A paint booth applies product to surfaces, then brake products enter a flash-off to dry/cure.		
Emission Unit Type		Spray Booth or Coatin	g Line	
Is this a combustion source?		N		
Is this combustion source used to generate	ate electricity?			
Design Capacity	Design Capacity N	umerator	Design Capacity Denominator	
Maximum Nameplate Capacity	•		Megawatts	
RULE 201 APPLICABILITY				
Grandfathered? N				
Exempt from Rule 201? N	If Yes, Ru	ıle Number		
If Rule 201 Exempt, Is Throughput Below	w Reporting Thresholds?			
Permit? Y	If Yes, En	ter the Permit Number	145-12B	
Is This Emission Unit Required To Repo	rt Emissions To MAERS	For This Reporting Year?	Υ	
	CONTR	ROL DEVICE(S)		
	EMISSIO	MILIMIT STACK(S)		
22. Stack ID SV-	Blechtopf-01	N UNIT STACK(S)		
22. Stack ID 3V-	DICCITODI-0 I			

SV-Blechtopf-02



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERE	:NCE						
Form Type	Emission	Unit		AQD Source	ce ID (SRN)	N6226	
			•				
EMISSION UNIT	DENTIFICAT	TION					
AQD Emission U	nit ID	EU0022		EU ID		EU-Mag	ni-01
NAICS Code (if o	different from	Source Form)	•	336340			
Installation Date	MM/DD/YYY	Y	05/01/20	)10	Dismantle [	Date MM/DD/	YYYY
Emission Unit Description - (Include Process Equipment and Control Devices)  [Disc Plant] (EU-Magni-01) - Brake rotors or drums ar heated using a single induction unit and HVLP spray apply coating to multiple surfaces of automotive brak products. Dry filters are used to collect any overspra paint booth applies product to surfaces, then brake p enter a flash-off to dry/cure.				induction unit and HVLP spray guns ple surfaces of automotive brake are used to collect any overspray. A coduct to surfaces, then brake products			
Emission Unit Ty	pe		<u> </u>		Spray Boo	th or Coatir	ng Line
Is this a combust	ion source?				N		
Is this combustio	n source used	d to generate e	electricity?				
Design Capacity		Design Capacity Nur			merator Design Capacity Denominator		
Maximum Name	plate Capacity	<i>y</i>	<u>'</u>				Megawatts
RULE 201 API	PLICABILI	TY					
Grandfathered?		N					
Exempt from Rul	e 201?	N		If Yes, Rul	e Number		
If Rule 201 Exem	npt, Is Throug	hput Below Re	porting Th	resholds?			
Permit?	Υ			If Yes, Ent	er the Permit N	lumber	145-12B
Is This Emission	Unit Required	To Report En	nissions T	o MAERS F	or This Reporti	ing Year?	Υ
				CONTR	OL DEVICE	(C)	
				CONTR	OL DEVICE	.(3)	
			E	MISSION	UNIT STAC	CK(S)	
22. Stack ID		SV-Mag	 gni-01				
22. Stack ID		SV0046	<b>;</b>				

SV0047



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE							
Form Type Emission Unit	AQD Source	ce ID (SRN) <b>N6226</b>					
	•						
EMISSION UNIT IDENTIFICATION							
AQD Emission Unit ID <b>EU0023</b>	EU ID	EU-Magni	-02				
NAICS Code (if different from Source Form	m) <b>336340</b>						
Installation Date MM/DD/YYYY	08/01/2011	Dismantle Date MM/DD/YY	YYY				
Emission Unit Description - (Include Process Equipment and Control Devices)  [Disc Plant] (EU-Magni-02) - Brake rotors or drums are preheated using a single induction unit and HVLP spray guns apply coating to multiple surfaces of automotive brake products. Dry filters are used to collect any overspray. A paint booth applies product to surfaces, then brake product enter a flash-off to dry/cure.							
Emission Unit Type		Spray Booth or Coating	Line				
Is this a combustion source?		N					
Is this combustion source used to generat	e electricity?						
Design Capacity	Design Capacity Nu	ımerator	Design Capacity Denominator				
Maximum Nameplate Capacity	•	Megawatts					
RULE 201 APPLICABILITY							
Grandfathered? N							
Exempt from Rule 201? N	If Yes, Rul	e Number					
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?							
Permit?	If Yes, Ent	er the Permit Number	145-12B				
Is This Emission Unit Required To Report	Emissions To MAERS F	For This Reporting Year?	Υ				
CONTROL DEVICE(S)							
	CONTROL DEVICE(3)						
	EMISSION	I UNIT STACK(S)					

SV0068



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE				
Form Type Emission Unit	AQD Source	e ID (SRN) <b>N6226</b>		
	•			
EMISSION UNIT IDENTIFICATION				
AQD Emission Unit ID <b>EU0024</b>	EU ID	EU-Ma	gni-03	
NAICS Code (if different from Source Fo	orm) <b>336340</b>			
Installation Date MM/DD/YYYY	11/20/2013	Dismantle Date MM/DI	D/YYYY	
Emission Unit Description - (Include Pro Control Devices)	cess Equipment and	heated using a single apply coating to mulproducts. Dry filters	gni-03) - Brake rotors or drums are pre- e induction unit and HVLP spray guns ltiple surfaces of automotive brake s are used to collect any overspray. A product to surfaces, then brake products ry/cure.	
Emission Unit Type		Spray Booth or Coat	ting Line	
Is this a combustion source?		N		
Is this combustion source used to gener	ate electricity?			
Design Capacity	Design Capacity Nu	merator	Design Capacity Denominator	
Maximum Nameplate Capacity Megawatts				
RULE 201 APPLICABILITY				
Grandfathered? N				
Exempt from Rule 201? N	If Yes, Rule	e Number		
If Rule 201 Exempt, Is Throughput Below	w Reporting Thresholds?			
Permit? Y	If Yes, Ente	er the Permit Number	145-12B	
Is This Emission Unit Required To Repo	rt Emissions To MAERS F	or This Reporting Year?	Υ	
	CONTR	OL DEVICE(S)		
	EMISSION	UNIT STACK(S)		

SV-Magni-03



# 2018 Emission Unit Form

FORM REFERENCE			
Form Type Emission Unit		ource ID (SRN) N62	26
EMISSION UNIT IDENTIFICATION			
AQD Emission Unit ID <b>EU0025</b>	EU ID	EU-	Magni-04
NAICS Code (if different from Source Form	336340		
Installation Date MM/DD/YYYY	12/18/2013	Dismantle Date MIV	/DD/YYYY
Emission Unit Description - (Include Proces Control Devices)	s Equipment and	heated using a sing a sing apply coating to reproducts. Dry filt	Magni-04) - Brake rotors or drums are prengle induction unit and HVLP spray guns nultiple surfaces of automotive brake ers are used to collect any overspray. A es product to surfaces, then brake products o dry/cure.
Emission Unit Type		Spray Booth or C	oating Line
Is this a combustion source?		N	
Is this combustion source used to generate	electricity?		
Design Capacity	Design Capacity	Numerator	Design Capacity Denominator
Maximum Nameplate Capacity	•		Megawatts
RULE 201 APPLICABILITY			
Grandfathered?			
Exempt from Rule 201? N	If Yes,	Rule Number	
If Rule 201 Exempt, Is Throughput Below R	eporting Threshold	s?	
Permit? Y	If Yes,	Enter the Permit Number	145-12B
Is This Emission Unit Required To Report E	missions To MAER	S For This Reporting Year	? <b>Y</b>
	CON	TROL DEVICE(S)	
	EMISSI	ON UNIT STACK(S)	
22. Stack ID SV-Ma	igni-04		



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFERENCE						
Form Type Emission Unit AQD Source		e ID (SRN) <b>N6226</b>				
	•					
EMISSION UNIT IDENTIFICATION						
AQD Emission Unit ID <b>EU0027</b>	EU ID	EU-Ma	gni-05			
NAICS Code (if different from Source Form) 336340						
Installation Date MM/DD/YYYY	03/01/2014	Dismantle Date MM/DE	D/YYYY			
Emission Unit Description - (Include Process Equipment and Control Devices)  [Disc Plant] Brake rotor or drums are pre-heated, and dried following coating application, using electric induction heaters. The coating application is done in a spray booth using robotic HVLP spray applicators to apply coatings to multiple surfaces of automotive brake products. The spray booth will be equipped with dry filters to collect any overspray.						
Emission Unit Type		Spray Booth or Coat	ing Line			
Is this a combustion source?						
Is this combustion source used to generate e	electricity?					
Design Capacity	Design Capacity Nu	merator	Design Capacity Denominator			
Maximum Nameplate Capacity Megawatts			Megawatts			
RULE 201 APPLICABILITY						
Grandfathered?						
Exempt from Rule 201? N If Yes, Rule Number						
If Rule 201 Exempt, Is Throughput Below Reporting Thresholds?						
Permit? Y If Yes, Enter the Permit Number 145-12B						
Is This Emission Unit Required To Report Emissions To MAERS For This Reporting Year?						
	CONTR	OL DEVICE(S)				
	EMICOLON.	LINIT STACK(S)				

SV0065



# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Emission Unit Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFEREN	ICE			
Form Type Emission Unit		AQD Sou	rce ID (SRN) <b>N6226</b>	
EMISSION UNIT ID	ENTIFICATION			
AQD Emission Uni	t ID <b>EU0033</b>	EU ID	EU-GeoM	et-03
NAICS Code (if diff	ferent from Source Form)	336340		
Installation Date M	M/DD/YYYY	08/15/2016	Dismantle Date MM/DD/YY	/YY
Emission Unit Desi Control Devices)	cription - (Include Proces	s Equipment and	to multiple surfaces of a are used to collect any	t-03) - HVLP spray guns apply coating automotive brake products. Dry filters overspray. One booth applies paint. eated in a drying oven before moving
Emission Unit Type	Э		Spray Booth or Coating	Line
Is this a combustio	n source?		N	
Is this combustion	source used to generate	electricity?		
Design Capacity		Design Capacity N	lumerator	Design Capacity Denominator
Maximum Namepla	ate Capacity			Megawatts
RULE 201 APPI	LICABILITY			
Grandfathered?	N			
Exempt from Rule	201? <b>N</b>	If Yes, Ru	ule Number	
If Rule 201 Exemp	t, Is Throughput Below R	eporting Thresholds?		
Permit?	Υ	If Yes, Er	nter the Permit Number	145-12B
Is This Emission U	nit Required To Report E	missions To MAERS	For This Reporting Year?	Υ
		CONT	ROL DEVICE(S)	
		EMISSIO	N UNIT STACK(S)	
22. Stack ID	SV-Ge	oMet-III-01		

SV-GeoMet-III-02



# 2018 Emission Unit Form

FORM REFERENCE					
Form Type Emission U	Jnit	AQD Source ID (SRN) N6226			
				'	
EMISSION UNIT IDENTIFICATION	ON				
AQD Emission Unit ID	EU0034	EU ID		EU-RustPro	phibit
NAICS Code (if different from So	ource Form)				
Installation Date MM/DD/YYYY	01/01/2	016	Dismantle Da	ate MM/DD/YYY	Y
Emission Unit Description - (Incl Control Devices)	ude Process Equipme	ent and	[Disc Plant]	Rust Prohob	itor application activity (exempt).
Emission Unit Type			Unclassified	k	
Is this a combustion source?			N		
Is this combustion source used t	o generate electricity?	>			
Design Capacity	Design	Capacity Num	nerator		Design Capacity Denominator
Maximum Nameplate Capacity	•				Megawatts
RULE 201 APPLICABILIT	Y				
Grandfathered?	N				
Exempt from Rule 201? Y If Yes, Rule Number Rule 290					
If Rule 201 Exempt, Is Throughp	out Below Reporting T	hresholds?		N	
Permit? N		If Yes, Enter	the Permit Nu	mber	
Is This Emission Unit Required	To Report Emissions	To MAERS Fo	r This Reportin	g Year?	Υ
		CONTRO	L DEVICE(	S)	
		- MICCION I	LINIT OTA O	V/C)	
		=INISSION (	UNIT STAC	N(2)	



FORM REFERENCE

# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS) 2018 Reporting Group Form

Authorized under 1994 P.A. 451, as amended. Completion of this form is optional.

Form Type	Reporting Group	AQD Sourc	e ID (SRN)	N6226	
REPORTING O	GROUP IDENTIFICATION	ON .			
AQD Reporting		RG0001	Reporting (	Group ID	RG-GeoMet
Reporting Grou	orting Group Description [Disc Plant] Motor vehicle brake rotor/drum metal surface coating line				

REPORTING GROUP EMISSION UNITS		
7. Emission Unit ID	EU-GeoMet-01	
7. Emission Unit ID	EU-GeoMet-02	



# **2018 Reporting Group Form**

Authorized under 1994 P.A. 451, as amended. Completion of this form is optional.

FORM REFEREN	FORM REFERENCE						
Form Type	Reporting Group	AQD Source ID (SRN)	N6226				

REPORTING GROUP IDENTIFICATION							
AQD Reporting Group ID RG0002 Reporting Group ID RG-BMG							
Reporting Group Description	[Disc Plan	nt] Motor vehicle brake rotor/	drum metal surface coating line				

REPORTING GROUP EMIS	REPORTING GROUP EMISSION UNITS				
7. Emission Unit ID	EU-Magni-01				
7. Emission Unit ID	EU-Magni-02				
7. Emission Unit ID	EU-Magni-03				
7. Emission Unit ID	EU-Magni-04				
7. Emission Unit ID	EU-Black (Sp)				
7. Emission Unit ID	EU-Magni-05				
7. Emission Unit ID	EU-GeoMet-03				



# **2018 Reporting Group Form**

Authorized under 1994 P.A. 451, as amended. Completion of this form is optional.

FORM REFEREN	ICE		
Form Type	Reporting Group	AQD Source ID (SRN)	N6226

REPORTING GROUP IDENTIFICATION							
AQD Reporting Group ID RG0003 Reporting Group ID RG-Zinc							
Reporting Group Description	[Disc Plan	t] Motor vehicle brake rotor	drum metal surface coating line				

REPORTING GROUP EMIS	REPORTING GROUP EMISSION UNITS				
7. Emission Unit ID	EU-Zinc-01				
7. Emission Unit ID	EU-Zinc-02				
7. Emission Unit ID	EU-Zinc-03				
7. Emission Unit ID	EU-Zinc-04				
7. Emission Unit ID	EU-Zinc-05				



Sulfur Content (fuel)

# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS) 2018 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

ivity	AQD Source	e ID (SRN)	N6226	EU ID	RG-Geol	/let	
TION							
Code	(SCC)	40202501					
		[Disc Plant] M	letal surface coa	iting			
LICAC	E COUEDIII	E IE TUROUCH	DUTIES O THEM	CEACONAL DI	EDCENTACES MUST	TOTAL 4009/	
USAG							
	Spring (Mar-May)		Summer (J	Summer (Jun-Aug)		-Nov)	
	32		24	24			
.E							
		Days per Week	(	Days			
		7		36		365	
ION		•			•		
		Material Throug	ghput				
PAINT 7171					GAL		
		Primary paint	: GeoMet 360		•		
VOC Content (coatings or solvent) 14 % by Wei		14 % by Weig	ht	Density	11.05 LB	/GAL	
	Code USAG	Code(SCC)  USAGE SCHEDUL  Spring (Mail 32	Code(SCC) 40202501 [Disc Plant] M  USAGE SCHEDULE, IF THROUGH  Spring (Mar-May) 32  E  Days per Week 7  ON  Material Throug 7171  Primary paint	Code(SCC) 40202501  [Disc Plant] Metal surface coal  USAGE SCHEDULE, IF THROUGHPUT IS > 0, THEN  Spring (Mar-May)  32  Days per Week  7  ON  Material Throughput  7171  Primary paint: GeoMet 360	TION  Code(SCC) 40202501  [Disc Plant] Metal surface coating  USAGE SCHEDULE, IF THROUGHPUT IS > 0, THEN SEASONAL PI  Spring (Mar-May) Summer (Jun-Aug)  32 24  E Days per Week  7  ON  Material Throughput  7171  Primary paint: GeoMet 360	Code(SCC)	

Ash Content (fuel)

% by Weight

% by Weight



2018 Activity Form

FORM REFER	RENCE								
Form Type	Activity	AQD Sourc	e ID (SRN)		N6226	EU ID		RG-BMG	
ACTIVITY INF	ORMATION								
Source Classi	ification Code	(SCC)	40202501						
SCC Comment			[Disc Plant] Me	etal s	urface coati	ng			
SEASONAL MA	TERIAL USAG	SE SCHEDUL	E, IF THROUGHP	PUT IS	S > 0, THEN S	EASONAL PE	RCENTA	GES MUST TOTAL 100%	, o
Winter (Jan,Feb	o, Dec)	Spring (Mai	-May)		Summer (Jur	n-Aug)		Fall (Sep-Nov)	
21		28			27			24	
OPERATING SC	HEDULE			•					
Hours per Day			Days per Week				Days p	er Year	
24			7				365		
MATERIAL INFO	ORMATION								
Material Code			Material Throug	hput			Unit Co	ode	
PAINT			13076				GAL		
Material Descrip	ption		Primary Paint:	Mag	ni C40 Zinc	Primer			
VOC Content (d	coatings or solv	/ent)	13 % by Weigh	nt		Density		19.7 LB/GAL	
BTUs (fuel)						•			
Sulfur Content	(fuel)	% by Weig	jht		Ash Content	(fuel)	% by \	<b>Veight</b>	



2018 Activity Form

FORM REFER	RENCE								
Form Type	Activity	AQD Source	e ID (SRN)		N6226	EU ID		RG-Zinc	
ACTIVITY INF	ORMATION								
Source Class	ification Code	(SCC)	40202501						
SCC Comment			[Disc Plant] Me	etal s	surface coat	ng			
SEASONAL MA	TERIAL USAG	SE SCHEDUL	E, IF THROUGHP	UT IS	S > 0, THEN S	EASONAL PE	RCENTA	GES MUST TOTAL 100%	
Winter (Jan,Feb	o, Dec)	Spring (Mai	-May)		Summer (Ju	n-Aug)		Fall (Sep-Nov)	
17		28			30			25	
OPERATING SO	HEDULE								
Hours per Day			Days per Week				Days p	er Year	
24			7				365		
MATERIAL INFO	ORMATION								
Material Code			Material Throug	hput			Unit Co	ode	
PAINT			13336				GAL		
Material Descri	ption		Worwag Zinc [	Dust	Coating				
VOC Content (d	coatings or solv	/ent)	11 % by Weigh	ıt		Density		25.961 LB/GAL	
BTUs (fuel)						-			
Sulfur Content	(fuel)	% by Weig	jht		Ash Content	(fuel)	% by \	Weight	



Sulfur Content (fuel)

# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

# 2018 Activity Form

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

FORM REFEREI	VCE							
Form Type	Activity	AQD Sourc	e ID (SRN)	N6226	EU ID		EU-RustProhibit	
ACTIVITY INFOR	MATION							
Source Classifica	ation Code	(SCC)	40202501					
SCC Comment			[Disc Plant] Rust	Prohibitor app	lication (exc	empt)		
SEASONAL MATE	RIAL USAG	E SCHEDUL	E, IF THROUGHPUT	IS > 0, THEN SE	ASONAL PE	RCENTA	GES MUST TOTAL 100%	
Winter (Jan,Feb, D	ec)	Spring (Mar	r-May)	Summer (Jun-	-Aug)		Fall (Sep-Nov)	
25		25		25			25	
OPERATING SCHE	DULE			•				
Hours per Day			Days per Week			Days p	er Year	
24			7			365		
MATERIAL INFORI	MATION							
Material Code			Material Throughpo	ut		Unit Co	ode	
PAINT			6270			GAL		
Material Description	n		Rust Prohibitor -	SuperCool 310	YBW and R	P520LI (	avg)	
VOC Content (coa	tings or solv	rent)	6.5 % by Weight		Density		8.94 LB/GAL	
BTUs (fuel)								

Ash Content (fuel)

% by Weight

% by Weight



2018 Emissions Form

FORM REFERI	FORM REFERENCE							
Form Type	Emissions	AQD Source ID (	SRN) <b>N622</b> 0	EU ID	RG-GeoMet			
SCC	40202501		Material Code	PAINT				

EMISSION INFORMATION								
Pollutant Code	VOC	Annual Emissions	11598 LB					
Emission Basis	Mass Bal	•						
List Emission Factor		Exponent						
Emission Factor Unit Code	LB / GAL-V%	Control Efficiency	%					
Comment		•						



# **2018 Emissions Form**

FORM REFERENCE						
Form Type	Emissions	AQD Source ID (	SRN) <b>N6226</b>	EU ID	RG-BMG	
SCC	40202501		Material Code	PAINT		

EMISSION INFORMATION				
Pollutant Code	VOC	Annual Emissions	29640 LB	
Emission Basis	Mass Bal	•		
List Emission Factor		Exponent		
Emission Factor Unit Code	LB / GAL-V%	Control Efficiency	%	
Comment		•		



## 2018 Emissions Form

FORM REFERENCE							
Form Type	Emissions	AQD Source ID (	(SRN)	16226	EU ID	RG-Zinc	
SCC	40202501		Material Code	,	PAINT		

EMISSION INFORMATION	N		
Pollutant Code	ETHYLBENZENE	Annual Emissions	2770 LB
Emission Basis	Mass Bal	•	
List Emission Factor		Exponent	
Emission Factor Unit Code		Control Efficiency	%
Comment		<b>'</b>	

EMISSION INFORMATION			
Pollutant Code	VOC	Annual Emissions	36959 LB
Emission Basis	Mass Bal		
List Emission Factor		Exponent	
Emission Factor Unit Code	LB / GAL-V%	Control Efficiency	%
Comment			



# **2018 Emissions Form**

FORM REFERENCE						
Form Type	Emissions	AQD Source ID (	(SRN)	N6226	EU ID	EU-RustProhibit
SCC	40202501		Material C	ode	PAINT	

EMISSION INFORMATION					
Pollutant Code	VOC		Annual Emissions	3628 LB	
Emission Basis		MAERS EF	•		
List Emission Factor	7.36		Exponent	0	
Emission Factor Unit Code		LB / GAL-V%	Control Efficiency	%	
Comment			•		



# 2018 Preparer Form

FORM REFERE	NCE			
Form Type	Preparer	AQD Source ID (SRN)	N6226	

Preparer's F	First Name, Middle Initial	Christop	her	Preparer's Last Name	Blume
Preparer's Title					
Mailing Add	ress (Street Address 1)		135 S. LaSall	e Street	
Mailing Add	ress (Street Address 2)	Suite 3500			
City	Chicago	State/Province	IL		
Country	USA	Zip Code	60603		
E-Mail Addr	ess (if available)	christopher.blun	ne@rpsgroup.co	om	
Telephone I	Number (312) 26	24200	Telephone Ex	tension 71	
Telephone I		524200	Telephone Ex	tension <b>71</b>	

PREPARER'S ID (only complete this area if yo	ou have more than one preparer)
Preparer's Reporting Group or Emission Unit ID	RG-GeoMet
Preparer's Reporting Group or Emission Unit ID	RG-BMG
Preparer's Reporting Group or Emission Unit ID	RG-Zinc
Preparer's Reporting Group or Emission Unit ID	EU-RustProhibit
Preparer's Reporting Group or Emission Unit ID	EUSHAKEOUT
Preparer's Reporting Group or Emission Unit ID	EUFINISHING
Preparer's Reporting Group or Emission Unit ID	EUNATGAS
Preparer's Reporting Group or Emission Unit ID	EUCOREMIX
Preparer's Reporting Group or Emission Unit ID	EUCOREMAKING
Preparer's Reporting Group or Emission Unit ID	EUENGINE1
Preparer's Reporting Group or Emission Unit ID	RGMELTING
Preparer's Reporting Group or Emission Unit ID	RGPOURCOOL
Preparer's Reporting Group or Emission Unit ID	RGSANDHNDLG



FORM REFERENCE

# Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

## 2018 Submittal Form

(Required Form)

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

Form Type Submittal AQD Source ID (SRN) No.							
SOURCE IDENT	TIFICATION						
Source Name	Bremb	o North America, Inc.					
Mailing Address (	(Street Address 1)			29991 M 60	EAST		
Mailing Address (	(Street Address 2)						
County	CALHOUN	City	HOMER		Zip Code	49245-	
Submittal Method	Electro	onic			Amended Su	bmittal	

PRIMARY PREPARER'S AUTHORIZATION				
Based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate, and complete.				
Primary Preparer				
Telephone Number	Telephone Extension			
E-Mail Address (if available)				
Signature	Date			

#### **Certification Receipt:**

- Submission ID:
- Submission Received Date:
- · Certifier's (Primary Preparer) full name:
- · Certifier's Address:
- Email Address:
- Certification Statement:
- Security Question:
- Answer to the security question: Encrypted on file
- PIN used: Encrypted on file
- Submitter's IP address:

#### **Attachment Details:**

Document Name	File Name	File Size	Description
			•



**New Emissions Units MAERS Forms** 



1.	INVENTORY YEAR
	2019

### SV-101 STACK

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report stacks for a **specific inventory year**. Enter the **specific inventory year** in field 1.

FORM REFEREN	CE									
2. Form Type <b>SV-101</b>		ource ID (SRI	<b>N</b> )							
	N62	226								
STACK IDENTIFIC	CATION				□ C	hange		☑ Add		
4. AQD Stack ID		5. Stack ID SV	) -Prototype		6.	Remove fro	m MAERS No	7. Dismantle	Date (M	M/DD/YYYY)
8. Stack Description		l .			· · · · · ·					
Stack for EU-Prototyp	е									
Actual Stack Height     Above Ground	40			feet		de Stack meter	20			inches
11. Exit Gas			_	degrees	12. Act	ual Exit	unknowr	1		cubic feet
Temperature  13. Stack Orientation	unknown  Vertical	Vertical w	rith No Loss Sl	ahrenheit		Flow Rate Conical Cap	Horizo		ee Neck [	per minute Downward
14. Latitude	Vertical		Longitude	eeve — ve	Tucai witii		ntal Collection		36 INCCK L	
			-		. –		ina concon	on wellou		
42 _ 16354 _ [	Decimai Degr	ees <u>-04</u>	<u> 7169</u>	Decima	Degrees	004				
17. Source Map Scale Nu	ımber	1		18. Horizo	ntal Accui	acy Measure			25	Meters
19. Horizontal Reference	Datum Code	02		20. Refere	ence Point	Code	101			
21A. Bypass Stack Only	Yes	XI No	21B. If yes, o	perator ID of	main sta	ck				
STACK IDENTIFIC	CATION	1				hange				
4. AQD Stack ID		5. Stack ID SV -l	ine-57		6.	Remove fro Yes	m MAERS No	7. Dismantle	Date (M	M/DD/YYYY)
8. Operator's Stack Desc	ription									
Stack for EU-Line 57										
<ol><li>Actual Stack Height Above Ground</li></ol>		40		feet		le Stack meter		20		inches
11. Exit Gas	unknov	/n	-	degrees	12. Act	ual Exit	unkno	wn		cubic feet per minute
Temperature  13. Stack Orientation	Vertical	Vertical w	ith No Loss Sle	ahrenheit eeve		S Flow Rate Conical Cap	Horizon	tal Goos	se Neck D	
14. Latitude			Longitude				ntal Collection			
<u>42     16354                                    </u>	Decimal Degr	ees - <u>84</u>	_ 7169_	Decima	l Degrees	004				
17. Source Map Scale Nu	ımber			18. Horizo	ntal Accu	acy Measure				Mataua
19. Horizontal Reference	Datum Code	02		20. Reference Point Code 101				ivieters		
21A. Bypass Stack Only	Yes	■ No		21B. If yes	s, operato	· ID of main s				
,,				, , , ,						

EQP 5749 (Rev 11/11)



1.	INVENTORY YEAR
	2019

### SV-101 STACK

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report stacks for a **specific inventory year**. Enter the **specific inventory year** in field 1.

FORM REFERENCE								
2. Form Type <b>SV-101</b> 3. AQD S	Source ID (SRN)							
N6	226							
STACK IDENTIFICATION			☐ Cha	inge				
4. AQD Stack ID	5. Stack ID SV Line-67			emove fror Yes	MAERS No	7. Dismant	e Date (N	MM/DD/YYYY)
8. Stack Description			•		•			
Stack for EU-Line 67								
Actual Stack Height     Above Ground     40		feet	10. Inside S Diamet	er	20			inches
11. Exit Gas Temperature unknown	F	degrees ahrenheit	12. Actual Gas Flo	Exit ow Rate	unknown			cubic feet per minute
13. Stack Orientation X Vertical	Vertical with No Loss Sle	eeve 🗖 Vert			Horizor	ntal 🔲 God	se Neck	Downward
14. Latitude	15. Longitude			16. Horizo	ntal Collection	n Method		
42 16354 _ Decimal Deg	rees <u>-84</u> <u> 7169</u>	Decimal I	Degrees	004				
17. Source Map Scale Number	•	18. Horizon	tal Accuracy	Measure			25	Meters
19. Horizontal Reference Datum Code 02			20. Reference Point Code 101					
21A. Bypass Stack Only  Yes	No 21B. If yes, o	perator ID of r	main stack					
						_		
STACK IDENTIFICATION	T		☐ Cha			Add     Add		
4. AQD Stack ID	5. Stack ID SV -Line-68			emove fron Yes	n MAERS No	7. Dismantl	e Date (N	MM/DD/YYYY)
8. Operator's Stack Description	•		l .					
Stack for EU-Line 68								
Actual Stack Height     Above Ground	40	feet	10. Inside S Diamet			20		inches
11. Exit Gas Temperature unkno	AND		12. Actual		unknov			cubic feet per minute
13. Stack Orientation  Vertical	Vertical with No Loss Sle	eve	cal with Con	nical Cap	Horizon	tal 🗖 Goo	se Neck I	Downward
14. Latitude	15. Longitude			16. Horizo	ntal Collection	n Method		
42 _ 16354 _ Decimal Deg	rees -84 - 7169	Decimal I	Degrees	004				
17. Source Map Scale Number	18. Horizon	tal Accuracy	Measure			25	Meters	
	20. Reference Point Code 101							
19. Horizontal Reference Datum Cod	e 02	20. Referen	ice Point Co	de 10	)1			

EQP 5749 (Rev 11/11)



1.	INVENIC	RY YEAR
	2019	

**EU-101 EMISSION UNIT** 

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FORM REFERENCE					
2. Form Type <b>EU-101</b>	3. AQD Sour	ce ID (SRN)			
	N6226				
	·				
OPERATOR'S EMISSION UNIT IL	DENTIFICATION		hange	🛛 Add	
AQD Emission Unit ID	5. Emission Unit ID		6. Emission Unit	Туре	
	EU-Prototype		Spray Booth		
7. NAICS Code (if different from S-101 #5)	8. Installation Date MM/l	DD/YYYY	9. Dismantle Date	e MM/DD/YYYY	
336340	June 2020				
10. Operator's Emission Unit Description – (Inc.	ı lude process equipment ar	nd control devices)	l		
HVLP spray guns apply coatings to multiple so Brake products may be heated before and/or down. Dry filters are used to collect any overs	after the part is painted. As	sociated cool down/dry			
11. Combustion Source Yes	No	12. Design Capacit	у		
13. Design Capacity Unit Numerator		14. Design Capacit	y Unit Denominator		
15. Is this combustion source used to generate	electricity Yes No	16. Maximum Nam	eplate Capacity		Megawatts
	RULE 201	APPLICABILITY			
17. Grandfathered? ☐ Yes ☐ No					
18. Exempt from Rule 201?   Yes	No	19. If Yes, Rule Nu	mber Rule 290		
20. If Rule 201 Exempt, Is Throughput Below R	eporting Thresholds?	res			
21. Permit? Yes You		22. If Yes, Enter the	e Permit Number		
23. Is this emission unit required to report emiss			year)? 🛚 Yes	□No	
OA Control Desire		DL DEVICE(S)			
24. Control Device Code	□Add □Delete	24. Control Device Code			□ <sub>Add</sub> □ <sub>Delete</sub>
24. Control Device Code	□Add □Delete	24. Control Device Code			□ <sub>Add</sub> □ <sub>Delete</sub>
24. Control Device Code	□Add □Delete	24. Control Device Code			Add Delete
	EMISSION	UNIT STACK(S)			
25. Operator's Stack ID <b>SV</b> -Prototype		25. Operator's Stack ID <b>S\</b>	1		□ <sub>Add</sub> □ <sub>Delete</sub>
25. Operator's Stack ID <b>SV</b>	□Add □Delete	25. Operator's Stack ID <b>S\</b>			Add Delete
25. Operator's Stack ID SV	□Add □Delete	25. Operator's Stack ID <b>S\</b>			Add Delete
25. Operator's	□Add □Delete	25. Operator's			Add Delete
Stack ID <b>SV</b> 25. Operator's	□Add □Delete	Stack ID <b>S\</b> 25. Operator's	1		Пан Поли
Stack ID <b>SV</b>	<b>⊸</b> Aad <b>⊸</b> Delete	Stack ID S\	1		□ <sub>Add</sub> □ <sub>Delete</sub>



## **EU-101 EMISSION UNIT**

1.	INVENTORY YEAR	
2	2019	

Authorized under 1994 P.A. 451, as amended. Completion of information is required. Civil and/or criminal penalties possible for providing false information.

**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report emission units used in a **specific inventory year**. Enter the **inventory year** for which the emission units are being reported in field 1.

FORM REFERENCE				
2. Form Type <b>EU-101</b>	3. AQD Sour	ce ID (SRN)		
	N6226			
	•			
OPERATOR'S EMISSION UNIT ID	ENTIFICATION		hange	☑ Add
AQD Emission Unit ID	<ol><li>Emission Unit ID</li></ol>		6. Emission Unit T	ype
	EU - Line 57		Spray Booth or	Coating Line
7. NAICS Code (if different from S-101 #5)	8. Installation Date MM/I	DD/YYYY	9. Dismantle Date	MM/DD/YYYY
336340	April 2019			
10. Operator's Emission Unit Description – (Incl	•	d control devices)		
HVLP spray guns apply coatings to multiple su Brake products may be heated before and/or a cool down. Dry filters are used to collect any o	after the part is painted. As	sociated cool down/dry		
11. Combustion Source  Yes	No	12. Design Capacit	у	
13. Design Capacity Unit Numerator		14. Design Capacit	y Unit Denominator	
15. Is this combustion source used to generate	electricity Yes No	16. Maximum Nam	eplate Capacity	Megawatts
	RULE 201	APPLICABILITY		
17. Grandfathered? ☐ Yes ☐ No				
18. Exempt from Rule 201? Yes	No	19. If Yes, Rule Nu	mber Rule 287	
20. If Rule 201 Exempt, Is Throughput Below Ro	eporting Thresholds?	∕es □No		
21. Permit? Yes No		22. If Yes, Enter the	e Permit Number	
23. Is this emission unit required to report emiss			year)? X Yes	□No
24. Control Device		DL DEVICE(S)		
Code	Add Delete	24. Control Device Code		Add Delete
24. Control Device Code	Add Delete	24. Control Device Code		■Add ■Delete
24. Control Device Code	□Add □Delete	24. Control Device Code		□Add □Delete
	EMISSION	UNIT STACK(S)		
25. Operator's Stack ID <b>SV</b> - Line 57	X <sub>Add</sub> □ <sub>Delete</sub>	25. Operator's Stack ID <b>SV</b>	1	□Add □Delete
25. Operator's Stack ID <b>SV</b>	□Add □Delete	25. Operator's Stack ID <b>SV</b>	Ī	□Add □Delete
25. Operator's Stack ID <b>SV</b>	□Add □Delete	25. Operator's Stack ID SV		□Add □Delete
25. Operator's	Add Delete	25. Operator's		□Add □Delete
Stack ID <b>SV</b> 25. Operator's	Add Delete	Stack ID <b>SV</b> 25. Operator's	•	Add Delete
Stack ID <b>SV</b>	■Add ■Delete	Stack ID SV	1	■Add ■Delete



1.	INVENTORY	YEAR
2	2019	

## **EU-101 EMISSION UNIT**

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**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report emission units used in a **specific inventory year**. Enter the **inventory year** for which the emission units are being reported in field 1.

FORM REFERENCE				
2. Form Type <b>EU-101</b>	3. AQD Sour	ce ID (SRN)		
	N6226			
	•			
OPERATOR'S EMISSION UNIT ID	DENTIFICATION		hange	Add
AQD Emission Unit ID	<ol><li>Emission Unit ID</li></ol>		6. Emission Unit	Туре
	EU-Line 67		Spray Booth	
7. NAICS Code (if different from S-101 #5)	8. Installation Date MM/	DD/YYYY	9. Dismantle Date	e MM/DD/YYYY
336340	June 2020			
10. Operator's Emission Unit Description – (Incl	ude process equipment ar	nd control devices)		
HVLP spray guns apply coatings to multiple su Brake products may be heated before and/or a down. Dry filters are used to collect any overs	after the part is painted. As	sociated cool down/dry		
11. Combustion Source Yes	No	12. Design Capacit	у	
13. Design Capacity Unit Numerator		14. Design Capacit	y Unit Denominator	
15. Is this combustion source used to generate	electricity Yes No	16. Maximum Nam	eplate Capacity	Megawatts
	RULE 201	APPLICABILITY		
17. Grandfathered? ☐ Yes ☐ No				
18. Exempt from Rule 201?   Yes   Yes	No	19. If Yes, Rule Nu	mber Rule 290	
20. If Rule 201 Exempt, Is Throughput Below R	eporting Thresholds?	res $\square_{No}$		
21. Permit? Yes You		22. If Yes, Enter the	e Permit Number	
23. Is this emission unit required to report emiss			year)? 🛚 Yes	□No
O4 Control Project		DL DEVICE(S)		
24. Control Device Code	□Add □Delete	24. Control Device Code		□Add □Delete
24. Control Device Code	□Add □Delete	24. Control Device Code		□Add □Delete
24. Control Device Code	□Add □Delete	24. Control Device Code		□Add □Delete
	EMISSION	UNIT STACK(S)		
25. Operator's Stack ID <b>SV</b> -Line-67		25. Operator's Stack ID <b>SV</b>	1	□Add □Delete
25. Operator's Stack ID <b>SV</b>	□Add □Delete	25. Operator's Stack ID <b>SV</b>		□Add □Delete
25. Operator's Stack ID SV	Add Delete	25. Operator's		□Add □Delete
25. Operator's	□Add □Delete	25. Operator's		□Add □Delete
Stack ID <b>SV</b> 25. Operator's		Stack ID <b>SV</b> 25. Operator's	1	
Stack ID <b>SV</b>	□Add □Delete	Stack ID SV	<u> </u>	□ <sub>Add</sub> □ <sub>Delete</sub>



1.	INVENTORY	YEAR
2	2019	

## **EU-101 EMISSION UNIT**

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**GENERAL INSTRUCTIONS:** Refer to last year's MAERS forms or summary report for information previously submitted, and complete this form as applicable with additions or corrections as necessary. For more detailed instructions refer to the MAERS General Instructions Booklet. This MAERS form is used to report emission units used in a **specific inventory year**. Enter the **inventory year** for which the emission units are being reported in field 1.

FORM REFERENCE						
Form Type <b>EU-101</b> 3. AQD Source ID (SRN)						
	N6226					
	•					
OPERATOR'S EMISSION UNIT I	DENTIFICATION		Change	Add		
AQD Emission Unit ID     5. Emission Unit ID			6. Emission Unit	Туре		
	EU-Line 68		Spray Booth			
7. NAICS Code (if different from S-101 #5)	8. Installation Date MM/I	DD/YYYY	Dismantle Date MM/DD/YYYY			
336340	June 2020					
Operator's Emission Unit Description – (Inc.)	I clude process equipment an	d control devices)				
HVLP spray guns apply coatings to multiple s Brake products may be heated before and/or down. Dry filters are used to collect any overs	after the part is painted. As	sociated cool down/dry				
11. Combustion Source Yes	11. Combustion Source Yes No 12		12. Design Capacity			
13. Design Capacity Unit Numerator	B. Design Capacity Unit Numerator 14. Design		y Unit Denominator	•		
15. Is this combustion source used to generate	e electricity Yes No	16. Maximum Nam	eplate Capacity		Megawatts	
	RULE 201	APPLICABILITY				
17. Grandfathered? ☐ Yes ☐ No						
18. Exempt from Rule 201?  ☐ Yes ☐ No		19. If Yes, Rule Number Rule 290				
20. If Rule 201 Exempt, Is Throughput Below F	Reporting Thresholds?	∕es □ No				
21. Permit? Yes No		22. If Yes, Enter the Permit Number				
23. Is this emission unit required to report emis			year)? 🛚 Yes	□No		
24. Control Device		DL DEVICE(S)  24. Control Device				
Code	□Add □Delete	Code		<b>L</b>	Add Delete	
24. Control Device Code	□ <sub>Add</sub> □ <sub>Delete</sub>	24. Control Device Code		Add Delete		
24. Control Device Code	□Add □Delete	24. Control Device Code			Add Delete	
	EMISSION	UNIT STACK(S)				
25. Operator's	X <sub>Add</sub> □ <sub>Delete</sub>	25. Operator's			Add Delete	
Stack ID <b>SV</b> -Line-68 25. Operator's		Stack ID S\ 25. Operator's	/			
Stack ID <b>SV</b>	■Add ■Delete	Stack ID <b>S\</b>	/	🗀	Add Delete	
25. Operator's Stack ID <b>SV</b>	□Add □Delete	25. Operator's Stack ID <b>S\</b>	I		Add Delete	
25. Operator's	□Add □Delete	25. Operator's			Add Delete	
Stack ID SV		Stack ID S\	/			
25. Operator's Stack ID <b>SV</b>	□ <sub>Add</sub> □ <sub>Delete</sub>	25. Operator's Stack ID <b>S\</b>	/	0	Add Delete	
GLOCK ID OF	<u> </u>	Otack ID O				



FORM REFERENCE

## Michigan Department of Environmental Quality - Air Quality Division Michigan Air Emissions Reporting System (MAERS)

1.	INVENTORY	YEAR
2	2019	

## **EU-101 EMISSION UNIT**

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	10.4000	ID (ODN)			
2. Form Type <b>EU-101</b>	3. AQD Source ID (SRN)				
	N6226				
OPERATOR'S EMISSION UNIT IDENTIFICATION			Change	Add	
4. AQD Emission Unit ID	5. Emission Unit ID		6. Emission U		
	EU - Diesel Fire Pum	np	Fire Pump Engine		
7. NAICS Code (if different from S-101 #5)	Installation Date MM/DD/YYYY		Dismantle Date MM/DD/YYYY		
336340	1993				
Operator's Emission Unit Description – (Inc.)	I lude process equipment an	d control devices)			
A 208 horsepower diesel fired emergency end	nine				
77 200 Horsepower dieser med emergeney eng	J.110.				
11. Combustion Source Yes	Combustion Source Yes No 12. Design Capacity				
Design Capacity Unit Numerator		14. Design Capac	ity Unit Donomino	tor	
HP		14. Design Capac	ity Offit Defioritina	HR	
15. Is this combustion source used to generate	electricity Yes No	16. Maximum Nar	neplate Capacity		M
		APPLICABILITY			Megawatts
17. Grandfathered? ☐ Yes ☐ No	11011				
17. Grandiathered? — Yes — No					
18. Exempt from Rule 201?   Yes □ No		19. If Yes, Rule Number Rule 285(2)(g)			
20. If Rule 201 Exempt, Is Throughput Below R	operting Thresholds 2 X V	∕es □No	raio 2	55(2)(9)	
20. If Naie 201 Exempt, is Throughput Below N	eporting Thesholds:	es <b>—</b> 110			
21. Permit? Yes No		22. If Yes, Enter the Permit Number			
			M		
23. Is this emission unit required to report emission	sions to MAERS for this rep	porting year (inventory	year)? 🔼 Yes	□ <sub>No</sub>	
	CONTRO	DL DEVICE(S)			
24. Control Device	Add Delete	24. Control Device			□ <sub>Add</sub> □ <sub>Delete</sub>
Code 24. Control Device	Add Delete	Code 24. Control Device			□ <sub>Add</sub> □ <sub>Delete</sub>
Code	Add Delete	Code			Add Delete
24. Control Device Code	□Add □Delete	24. Control Device Code			□Add □Delete
	EMISSION	UNIT STACK(S)			
25. Operator's	□ <sub>Add</sub> □ <sub>Delete</sub>	25. Operator's			□ <sub>Add</sub> □ <sub>Delete</sub>
Stack ID <b>SV</b>		Stack ID S	V		
25. Operator's Stack ID <b>SV</b>	□Add □Delete	25. Operator's Stack ID <b>S</b>	V		□Add □Delete
25. Operator's	□Add □Delete	25. Operator's	•		□ <sub>Add</sub> □ <sub>Delete</sub>
Stack ID <b>SV</b>		Stack ID S	V		<u> </u>
25. Operator's Stack ID <b>SV</b>	Add Delete	25. Operator's Stack ID <b>S</b>	V		□Add □Delete
25. Operator's	□ <sub>Add</sub> □ <sub>Delete</sub>	25. Operator's	•		□ <sub>Add</sub> □ <sub>Delete</sub>
Stack ID <b>SV</b>	■Add ■Delete	Stack ID S	V		■Add ■Delete