

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

EFFECTIVE DATE: July 8, 2020

ISSUED TO

Ventra Fowlerville, LLC

State Registration Number (SRN): N7413

LOCATED AT

8887 W. Grand River Avenue, Fowlerville, Livingston County, Michigan 48836

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N7413-2020

Expiration Date: July 8, 2025

Administratively Complete ROP Renewal Application Due Between
February 8, 2023 and February 8, 2024

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N7413-2020

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

Michigan Department of Environment, Great Lakes, and Energy



Brad Myott, Lansing District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order Number AQD 12019-22, entered on September 11, 2019 between the EGLE and the permittee.

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

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

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
- Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete.” The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

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

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

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

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUAPPROCESS	One down draft water wash spray booth and associated natural gas fired drying oven. Adhesion promoters are applied using four (4) robots with non-electrostatic applicators. Purge and cleanup emissions are included. (PTI No. 247-04B)	03-01-2006 / 04-11-2014	FGMACTSUBJECT FGCOATINGLINE
EUCOATINGLINE	One down draft water wash spray booth used for the application of basecoat materials. Basecoat(s) are applied using eight (8) robots with electrostatic applicators. One down draft water wash spray booth used for the application of clearcoat materials. Clearcoat(s) are applied using six (6) robots with electrostatic applicators. One natural gas-fired cure oven. Purge and cleanup emissions are included. (PTI No. 247-04B)	03-09-2006 / 04-11-2014	FGMACTSUBJECT FGCOATINGLINE
EUPIM	Plastic injection molding equipment. Note: there are no applicable requirements for this emission unit as was in their original PTI.	03-09-2006	NA
EUWASHLINE	Five stage aqueous wash system and drying oven used for pretreatment of parts prior to coating. Note: there are no applicable requirements for this emission unit as was in their original PTI.	03-01-2006	NA
EUBOILER1	1.75 MMBTU/hr natural gas fired boiler.	03-01-2006	FGBOILERMACT
EUBOILER2	1.75 MMBTU/hr natural gas fired boiler.	03-01-2006	FGBOILERMACT
EUBOILER3	2.0 MMBTU/hr natural gas fired boiler.	03-01-2006	FGBOILERMACT
EUDIESGEN	490 hp diesel fired emergency generator.	03-01-2006	FGRICEMACT

D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCOATINGLINE	One (1) interior and exterior plastic automotive parts coating line controlled by a regenerative thermal oxidizer (RTO).	EUAPPROCESS EUCOATINGLINE
FGMACTSUBJECT	EUAPPROCESS, EUCOATINGLINE as well as associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.	EUAPPROCESS EUCOATINGLINE
FGBOILERMACT	This Flexible Group establishes the national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP as found in 40 CFR Part 63, Subpart DDDDD.	EUBOILER1 EUBOILER2 EUBOILER3
FGRICEMACT	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition RICE and spark ignition RICE less than 500 bhp.	EUDIESGEN

**FGCOATINGLINE
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

One (1) interior and exterior plastic automotive parts coating line controlled by a regenerative thermal oxidizer (RTO). (PTI No. 247-04B)

Emission Units: EUAPPROCESS, EUCOATINGLINE

POLLUTION CONTROL EQUIPMENT

Water wash systems, RTO

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	176.3 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGCOATINGLINE	SC VI.3 SC VI.4	R 336.1205(1)(a), R 336.1702(a)
2. Dibasic ester family (CAS Nos. 627-93-0, 106-65-0, 1119-40-0)	3.7 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FGCOATINGLINE	SC VI.3 SC VI.5	R 336.1225(1)
3. Ethylbenzene (CAS No. 100-41-4)	13.1 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FGCOATINGLINE	SC VI.3 SC VI.5	R 336.1225(2)
4. Formaldehyde (CAS No. 50-00-0)	1.4 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FGCOATINGLINE	SC VI.3 SC VI.5	R 336.1225(2)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall recover and reclaim, recycle, or dispose of, in accordance with all applicable regulations, a minimum of 70 percent by weight of all purge solvents used for FGCOATINGLINE.² **(R 336.1224, R 336.1702(a))**
2. The permittee shall capture all waste coatings, purge and cleanup solvents, and shall store them in closed containers. The permittee shall dispose of all waste coatings, purge and cleanup solvents in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1702(a))**
3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, thinners and solvents, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1224, R 336.1702(a))**

4. The permittee shall not operate FGCOATINGLINE unless a malfunction abatement plan (MAP) as described in Rule 911(2) has been submitted within 180 days of permit issuance (December 6, 2013), and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables (e.g., temperature, air flow, etc.) that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
 - d. Records of all inspections or repairs, replacement of parts, operating parameters, corrective actions, operational changes, and malfunctions. The records shall be kept on file and made available to the Department upon request.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

5. The permittee shall not operate FGCOATINGLINE unless an acceptable plan that describes how emissions will be minimized during all startups, shutdowns and malfunctions has been submitted to the AQD District Supervisor. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices.² **(R 336.1911, R 336.1912)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, maintain, and operate in a satisfactory manner, all water wash systems to control particulate emissions from FGCOATINGLINE.² **(R 336.1224, R 336.1301, R 336.1331, R 336.1910)**
2. The permittee shall equip and maintain the spray booth portions of FGCOATINGLINE with automatic electrostatic applicators, automatic HVLP applicators, or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**
3. The permittee shall not operate FGCOATINGLINE unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 90 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), maintaining a minimum temperature of 1400°F, a minimum retention time of 0.5 seconds and maintaining capture according to the parameters measured during the most recent acceptable performance test.² **(R 336.1205, R 336.1702(a), R 336.1910, 40 CFR 64.6(c)(1)(i) and (ii), R 336.1213(3))**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content, and density of any coating as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1205, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

2. The permittee shall verify the VOC capture efficiency of the RTO for FGCOATINGLINE by testing at owner's expense, in accordance with Department requirements. At least once every 5 years, unless an acceptable demonstration has been made showing that the previous test results remain valid and representative, the permittee shall verify the VOC capture and destruction efficiency of the RTO for FGCOATINGLINE by testing at owner's expense, in accordance with Department requirements. 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. Verification of emission rates 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.² **(R 336.1205, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of FGCOATINGLINE. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1702(a), 40 CFR 64.6(c)(1)(i) and (ii))**
3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, thinner, and solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702)**
4. The permittee shall keep the following information on a monthly basis for the FGCOATINGLINE:
 - a. Gallons (with water) of each coating, reducer, thinner, purge and cleanup solvent used.
 - b. VOC content (with water) of each material as applied.
 - c. Gallons of each purge solvent reclaimed, as applicable.
 - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - f. Calculations, on a quarterly basis, of the percentage of purge solvents reclaimed.

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

5. The permittee shall keep the following information on a monthly basis for the FGCOATINGLINE:
 - a. Gallons (with water) of each dibasic ester family (CAS Nos. 627-93-0, 106-65-0, 1119-40-0), ethylbenzene (CAS No. 100-41-4), and formaldehyde (CAS No. 50-00-0) containing material used.
 - b. Where applicable, the gallons (with water) of each dibasic ester family (CAS Nos. 627-93-0, 106-65-0, 1119-40-0), ethylbenzene (CAS No. 100-41-4), and formaldehyde (CAS No. 50-00-0) containing material reclaimed.
 - c. The dibasic ester family (CAS Nos. 627-93-0, 106-65-0, 1119-40-0), ethylbenzene (CAS No. 100-41-4), and formaldehyde (CAS No. 50-00-0) content (with water) in pounds per gallon of each material used.
 - d. Dibasic ester family (CAS Nos. 627-93-0, 106-65-0, 1119-40-0), ethylbenzene (CAS No. 100-41-4), and formaldehyde (CAS No. 50-00-0) mass emission calculations determining the monthly emission rate in tons per calendar month.

- e. Dibasic ester family (CAS Nos. 627-93-0, 106-65-0, 1119-40-0), ethylbenzene (CAS No. 100-41-4), and formaldehyde (CAS No. 50-00-0) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ **(R 336.1225(1) and (2))**

6. The permittee shall monitor and record, in a satisfactory manner, the parameters that demonstrate capture during operation of FGCOATINGLINE. Monitoring can consist of measurements of duct static pressure, gas flow rate, or other methods acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1702(a))**
7. For the control device in operation during production (coating plastic parts, booth cleaning, etc.), the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass was open shall be kept on file. **(40 CFR 64.3(a)(2))**
8. The permittee shall develop, maintain and implement, a Compliance Assurance Monitoring (CAM) plan for FG-COATINGLINE. The CAM plan shall be updated as necessary to reflect changes in monitoring, to implement corrective actions and to address malfunctions. Changes in the CAM portion of the operations and maintenance plan shall be submitted to the district supervisor for review and approval. All records and activities associated with the CAM shall be kept on file for a period of at least five years and made available to the department upon request. **(40 CFR 64.6(c)(1)(i) and (ii), 40 CFR 64.7(e))**
9. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**
10. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
11. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

VII. REPORTING

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-RTO	42 ²	75 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-PREHEAT OVEN (3 ea)	10 ²	50 ²	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-COOLING	50 ²	60 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products.² **(40 CFR Part 63, Subpart A and Subpart PPPP)**
2. For the purposes of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(40 CFR 64.6(c)(2), R 336.1213(3))**
 - a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements SC IV.3.
 - b. A monitoring excursion is defined as a failure to properly monitor as required in SC VI.2.
 - c. A monitoring excursion is defined as failure to properly implement and/or maintain the O&M plan required in SC VI.8.
 - d. An exceedance is defined as a failure to meeting the emission limit(s) in SC I.1.
3. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64, R 336.1213(3))**

Footnotes:

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

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

**FGMACTSUBJECT
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

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

Emission Units: EUAPPROCESS, EUCOATINGLINE

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.16 lb per lb of coating solids ²	12-month rolling time period as determined at the end of each calendar month	New or Reconstructed - General Use Coating	SC V.1 SC VI.1 through SC VI.4	40 CFR 63.4490(a)(1)
2. Organic HAP	0.26 lb per lb of coating solids ²	12-month rolling time period as determined at the end of each calendar month	New or Reconstructed - Automotive Lamp Coating	SC V.1 SC VI.1 through SC VI.4	40 CFR 63.4490(a)(2)
3. Organic HAP	0.22 lb per lb of coating solids ²	12-month rolling time period as determined at the end of each calendar month	New or Reconstructed - Thermoplastic Olefin (TPO) Coating	SC V.1 SC VI.1 through SC VI.4	40 CFR 63.4490(a)(3)
4. Organic HAP	1.34 lb per lb of coating solids ²	12-month rolling time period as determined at the end of each calendar month	New or Reconstructed - Assembled On-road Vehicle Coating	SC V.1 SC VI.1 through SC VI.4	40 CFR 63.4490(a)(4)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each Thinner and/or Additive	No Organic HAP* ²	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1 SC VI.2 SC VI.3 SC VI.5	40 CFR 63.4491(a)
2. Each Cleaning Material	No Organic HAP* ²	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1 SC VI.2 SC VI.3 SC VI.5	40 CFR 63.4491(a)

* Determined according to 40 CFR 63.4541(a).

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.4541, 40 CFR 63.4551, and/or 40 CFR 63.4561.² **(40 CFR 63.4541, 40 CFR 63.4551, 40 CFR 63.4561)**

See Appendix 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 conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.4541, 40 CFR 63.4551, or 40 CFR 63.4561. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months.² **(40 CFR 63.4483, 40 CFR 63.4540, 40 CFR 63.4550, 40 CFR 63.4560)**
2. The permittee shall keep all records required by 40 CFR 63.4530 in the format and timeframes outlined in 40 CFR 63.4531.² **(40 CFR 63.4542(d), 40 CFR 63.4552(d), 40 CFR 63.4563(j))**
3. The permittee shall maintain, at a minimum, the following records for each compliance period:
 - a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart PPPP, and the documentation supporting each notification report.² **(40 CFR 63.4530(a))**
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating.² **(40 CFR 63.4530(b))**
 - c. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used.² **(40 CFR 63.4530(c)(1))**
 - d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541.² **(40 CFR 63.4530(c)(2))**
 - e. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used.² **(40 CFR 63.4530(d))**
 - f. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period.² **(40 CFR 63.4530(e))**
 - g. The mass fraction of coating solids for each coating used during each compliance period.² **(40 CFR 63.4530(f))**
 - h. The information specified in 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4).² **(40 CFR 63.4530(g))**
 - i. The date, time, and duration of each deviation.² **(40 CFR 63.4530(h))**

- For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.4490, for each compliance period, using Equation 1 of 40 CFR 63.4541. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.4541(a).² **(40 CFR 63.4542)**

VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- Semi-annual 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))**
- For the compliant material option, the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a) is a deviation that must be reported as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5).² **(40 CFR 63.4542(b))**
- The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.4510.² **(40 CFR Part 63, Subparts A and PPPP)**
- The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520. Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating operations were in compliance.² **(40 CFR 63.4520, 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-RTO	42 ²	75 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

FGBOILERMACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This Flexible Group establishes the national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP as found in 40 CFR Part 63, Subpart DDDDD.

Emission Units: EUBOILER1, EUBOILER2, EUBOILER3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall conduct the initial tune-up of the Boilers 1, 2, & 3 no later than January 31, 2016, and additional tune-ups every 5 years (no more than 61 months after the previous tune-up) thereafter of the boilers to demonstrate continuous compliance as specified in 40 CFR 63.7540(a)(10)(i) through (a)(10)(vi). **(40 CFR 63.7510(g), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(10))**
2. For an existing boiler or process heater located at a major source facility, not including limited use units, the permittee must have a one-time energy assessment performed by a qualified energy assessor as required in Table 3 of 40 CFR Part 63, Subpart DDDDD. **(40 CFR Part 63, Subpart DDDDD, Table 3)**
3. The permittee, at all times, must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**

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))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. As specified in 63.9(b)(4) and (5), if you startup your new or reconstructed affected source on or after January 31, 2013, you must submit an initial Notification not later than 15 days after the actual date of startup of the affected source. **(40 CFR 63.7545(c))**
5. The permittee shall submit compliance reports as required by 40 CFR 63.7550. The first time period covered by these reports shall be shortened so as to end on either June 30 or December 31, whichever date is the first date that occurs at least 180 days (or 1, 2, or 5 years, as applicable, if submitting an annual, biennial, or 5 year compliance report) after the compliance date that is specified for you source in 63.7495. **(40 CFR 63.7550)**

See Appendix 8

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, Subparts A and DDDDD for industrial, commercial, and institutional boilers and process heaters. **(40 CFR Part 63, Subparts A and PPPP)**

Footnotes:

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

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

FGRICEMACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition RICE and spark ignition RICE less than 500 bhp.

Emission Unit: EUDIESGEN

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each engine in FGRICEMACT shall be installed, maintained, and operated in a satisfactory manner. A list of recommended work practice standards as specified in 40 CFR 63.6602 and Table 2c, Item 6 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the recommended work practices specified in 40 CFR Part 63, Subpart ZZZZ, Table 2c:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2,
 - b. For SI RICE Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; or
 - c. For CI RICE inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary, and
 - d. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 6)**

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c of 40 CFR Part 63, Subpart ZZZZ. **(40 CFR 63.6625(j))**
3. The permittee shall install, maintain and operate each engine in FGRICEMACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6605, 40 CFR 63.6625(e))**

4. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each engine in FGRICEMACT to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**
5. The permittee shall not allow each engine in FGRICEMACT to exceed 100 hours per calendar year for maintenance checks and readiness testing and emergency demand response. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(i))**
6. The permittee may operate each engine in FGRICEMACT up to 50 hours per calendar year for non-emergency situations, but those hours are to be counted towards the 100 hours per calendar year for maintenance and testing and emergency demand response, as allowed in 40 CFR 63.6640(f)(2). **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter on each engine in FGRICEMACT. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

1. If using the oil analysis program in order to extend the specified oil change requirement in 40 CFR Part 63, Subpart ZZZZ, Table 2c, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. **(40 CFR 63.6625(j))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. For each engine in FGRICEMACT the permittee shall keep in a satisfactory manner, records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(2), 40 CFR 63.6660)**
2. For each engine in FGRICEMACT the permittee shall keep in a satisfactory manner, records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(5), 40 CFR 63.6660)**
3. For each engine in FGRICEMACT the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with operating limitations in SC III.3. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660)**

4. For each engine in FGRICEMACT the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
5. For each engine in FGRICEMACT the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semi-annual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit to the AQD District Supervisor, a semiannual compliance report, as specified in 40 CFR 63.6650, which contains all deviations during the reporting period from any applicable emission limitation or operating limitation. If there are no deviations from any applicable emission limitations or operating limitations, the report shall contain a statement that there were no deviations during the reporting period. The first report shall cover the period beginning on the applicable compliance date specified in 40 CFR 63.6595 and ending on June 30 (postmarked or delivered by July 31) or December 31 (postmarked or delivered by January 31), whichever date is the first date following the end of the first calendar half after the applicable compliance date. Each subsequent report must cover the semiannual period from January 1 through June 30, or from July 1 through December 31. The subsequent reports must be postmarked or delivered by July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period, except as allowed in 40 CFR 63.6650(b)(5). The compliance report must also contain the following information, as specified in 40 CFR 63.6650(c) and (d):
 - a. Company name and address.
 - b. Certification of the report by a responsible official.
 - c. Date of report and beginning and ending dates of the reporting period.
 - d. The number of malfunctions, including a brief description of each event, that occurred during the reporting period and a demonstration that the Malfunction Plan was followed during such events.
 - e. The total operating time of the RICE at which the deviation occurred during the reporting period.
 - f. The number, duration, and cause of deviations and the corrective action taken.

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

5. Each affected source that has obtained a Title V Renewable Operating Permit pursuant to 40 CFR Part 70 or Part 71 must report all deviations as defined in 40 CFR Part 63, Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual

monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. **(40 CFR 63.6650(f))**

6. If you own or operate an emergency stationary RICE with a site rating of more than 100 brake hp that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), you must submit an annual report according to the requirements below and as specified in 40 CFR 63.6650(h): **(40 CFR 63.6650(h), 40 CFR 63.6660)**
 - a. The report must contain the following information:
 - i. Company name and address where the engine is located.
 - ii. Date of the report and beginning and ending dates of the reporting period.
 - iii. Engine site rating and model year.
 - iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - v. Hours operated for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).
 - vi. Number of hours the engine is contractually obligated to be available for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).
 - vii. Hours spent for operation for the purpose specified in 40 CFR 63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.
 - viii. If there were no deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.
 - ix. If there were deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.
 - b. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.
 - c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.

See Appendix 8

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, Subparts A and ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

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

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

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

Appendix 2. Schedule of Compliance

On March 21, 2019, Ventra Fowlerville was sent a violation notice for violation of 40 CFR Part 63, Subpart PPPP emission limit of 0.16 pounds of HAP per pound of solids. The company was not properly calculating HAP emissions and/or the records inappropriately used control credit for compliance purposes without adequate capture monitoring data. The emission limit violation began in July 2017 and is currently ongoing as the limit is a 12-month rolling average. As the company utilizes lower HAP containing materials eventually the 12-month average emission limit will lower, and Ventra will again achieve compliance with the 0.16 pounds HAP per pound of solid limit. On September 11, 2019, Ventra signed Consent Order 2019-22 to resolve the violation and establish the following as a compliance schedule.

The company shall be in compliance with FG-MACTSUBJECT (40 CFR Part 63, Subpart PPPP) by no later than March 1, 2020. The company is also required to submit quarterly actual HAP emission rate records in accordance with the methods and procedures approved by the AQD Lansing District Supervisor. This information shall be submitted within 15 days following the end of the quarter in which the data was collected. The quarters shall end on March 31, June 30, September 30 and December 31 of the year.

Schedule of Compliance

The following schedule of compliance conforms with the provisions of Rule 119(a) and Rule 213(4).

Emission Unit/ Flexible Group ID and Condition No.	Applicable Requirement	Remedial Measure	Required Action	Milestone Date	Progress Reports
FG-MACTSUBJECT	40 CFR 63.4490	Use of lower HAP containing materials	Comply with the 0.16 pounds HAP per pound of solid limit	March 1, 2020	As required in Consent Order 2019-22

Progress Reports

The permittee shall submit Certified Progress Reports to the appropriate AQD District Supervisor using EGLE, AQD, Report Certification form (EQP 5736). 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. **(R 336.1213(4)(b))**

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N7413-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N7413-2014 is being reissued as Source-Wide PTI No. MI-PTI-N7413-20XX, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
247-04B	201500048/ June 23, 2015	<p>Incorporate PTI No. 247-04B.</p> <p>PTI No. 247-04B was for modification of a plastic exterior automotive parts coating line. The facility is a major HAP source.</p> <p>In November of 2014, the facility switched from using water borne adhesive promotor to a solvent borne adhesive promotor in EUAPPROCESS. The RTO will now control the EUAPPROCESS coating booth which previously controlled with a down draft water wash for particulate control. A new flexible group has been added that contains emission units EUAPPROCESS and EUCOATINGLINE.</p> <p>FGCOATINGLINE has emission limits that replace the current emission unit limits. Stack testing was conducted to show compliance in capture and destructive efficiency.</p>	EUAPPROCESS EUCOATINGLINE FGCOATINGLINE

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, Semi-annual, and Deviation Certification Reporting

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

B. Other Reporting

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