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

September 19, 2022

PERMIT TO INSTALL 397-94F

ISSUED TO
LexaMar Corporation

LOCATED AT 100 LexaMar Drive Boyne City, Michigan 49712

> IN THE COUNTY OF Charlevoix

STATE REGISTRATION NUMBER N2812

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

August 3, 2022	QUIRED BY RULE 203:
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:
September 19, 2022	
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD Air Quality Division

BACT Best Available Control Technology

CAA Clean Air Act

CAM Compliance Assurance Monitoring
CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

COMS Continuous Opacity Monitoring System

Department/department/EGLE Michigan Department of Environment, Great Lakes, and Energy

EU Emission Unit FG Flexible Group

GACS Gallons of Applied Coating Solids

GC General Condition
GHGs Greenhouse Gases

HVLP High Volume Low Pressure*

ID Identification

IRSLInitial Risk Screening LevelITSLInitial Threshold Screening LevelLAERLowest Achievable Emission RateMACTMaximum Achievable Control TechnologyMAERSMichigan Air Emissions Reporting System

MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emission Standard for Hazardous Air Pollutants

NSPS New Source Performance Standards

NSR New Source Review
PS Performance Specification

PSD Prevention of Significant Deterioration

PTE Permanent Total Enclosure

PTI Permit to Install

RACT Reasonable Available Control Technology

ROP Renewable Operating Permit

SC Special Condition

SCR Selective Catalytic Reduction SNCR Selective Non-Catalytic Reduction

SRN State Registration Number

TBD To Be Determined

TEQ Toxicity Equivalence Quotient

USEPA/EPA United States Environmental Protection Agency

VE Visible Emissions

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm Actual cubic feet per minute

British Thermal Unit BTU °C **Degrees Celsius** CO Carbon Monoxide

CO₂e Carbon Dioxide Equivalent dscf Dry standard cubic foot dscm Dry standard cubic meter °F Degrees Fahrenheit

Grains gr

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

ΗP Horsepower H_2S Hydrogen Sulfide

kW Kilowatt lb Pound Meter m Milligram mg Millimeter mm MM Million MW Megawatts

NMOC Non-Methane Organic Compounds

 NO_{x} Oxides of Nitrogen

Nanogram ng

PM Particulate Matter

Particulate Matter equal to or less than 10 microns in diameter PM10 Particulate Matter equal to or less than 2.5 microns in diameter PM2.5

Pounds per hour pph Parts per million ppm

Parts per million by volume ppmv ppmw Parts per million by weight

psia Pounds per square inch absolute Pounds per square inch gauge psig

Standard cubic feet scf

Seconds sec Sulfur Dioxide SO_2

TAC **Toxic Air Contaminant**

Temp Temperature THC Total Hydrocarbons

Tons per year tpy Microgram μg

μm Micrometer or Micron VOC Volatile Organic Compounds

Year yr

GENERAL CONDITIONS

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). (R 336.1301)
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. (R 336.2001)

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EU-BT1PANEL	A robotic blackout coating applicator to coat polycarbonate automotive roof panel perimeters with a 6-inch-wide blackout border. The applied coating in a booth will be partially captured and controlled by two exhaust fans and routed to the existing Regenerative Thermal Oxidizer (RTO) at the facility. The associated purge, wipe, and cleanup operations are included.	TBD	FG-BT1 FG-PPPP
EU-BT1FRAME	Near the booth, a separate, manual operation will apply a primer to metal roof frames with in-plant emissions (uncontrolled emissions). The associated purge, wipe, and cleanup operations are included.	TBD	FG-BT1, FG-PPPP

^{*} Please see the ROP for SCs associated with FG-PPPP

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

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-BT1	A robotic blackout coating applicator to coat polycarbonate automotive roof panel perimeters with a 6-inch-wide blackout border. The applied coating in a booth will be partially captured and controlled by two exhaust fans and routed to the existing Regenerative Thermal Oxidizer (RTO) at the facility. Near the booth, a separate, manual operation will apply a primer to metal roof frames with in-plant emissions (uncontrolled emissions). The associated purge, wipe, and cleanup operations are included.	EU-BT1PANEL, EU-BT1FRAME
FG-RULE621	All metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b).	EU-BT1FRAME (As of today)

FG-BT1 EMISSION UNIT CONDITIONS

DESCRIPTION

A robotic blackout coating applicator to coat polycarbonate automotive roof panel perimeters with a 6-inch-wide blackout border. The applied coating in a booth will be partially captured and controlled by two exhaust fans and routed to the existing Regenerative Thermal Oxidizer (RTO) at the facility. Near the booth, a separate, manual operation will apply a primer to metal roof frames with in-plant emissions (uncontrolled emissions). The associated purge, wipe, and cleanup operations are included.

Emission Unit ID: EU-BT1PANEL, EU-BT1FRAME

POLLUTION CONTROL EQUIPMENT

For EU-BT1PANEL: An existing Regenerative Thermal Oxidizer (RTO) to control VOC emissions.

I. EMISSION LIMIT(S)

		Time Period / Operating		Monitoring / Testing	Underlying Applicable
Pollutant	Limit	Scenario	Equipment	Method	Requirements
1. VOC	5.2 tpy	12-month rolling time period as determined at the end of each calendar month		SC VI.3	R 336.1702(a)
2. VOC	2,000 lb per month	Each calendar month	EU-BT1FRAME*	SC VI.3	R 336.1702(d)
3. VOC	1.3 tpy	12-month rolling time period as determined at the end of each calendar month		SC VI.3	R 336.1702(d)

II. MATERIAL LIMIT(S)

1. The permittee shall not use more than 100 gallons per year of purge, wipe, and cleanup solvents based on 12-month rolling time period as determined at the end of each calendar month.¹ (R 336.1224, R 336.1225(1))

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste primer, coating, purge and cleanup solvents, etc. (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1225, R 336.1702(a))
- 2. The permittee shall handle all VOC and HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1225, R 336.1702(a))
- 3. The permittee shall not operate EU-BT1PANEL unless a malfunction abatement plan (MAP) for the Regenerative Thermal Oxidizer (RTO), as described in Rule 911(2), is submitted, implemented, and maintained within 60 days from commencement of trial operation of EU-BT1PANEL. 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 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) A description of the procedures to capture, handle, and dispose of all materials to minimize the generation of fugitive emissions per SC numbers III.1 and III.3.

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

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

- 1. The permittee shall equip and maintain EU-BT1PANEL with robotic brush applicators or comparable technology with equivalent transfer efficiency. (R 336.1702(a))
- 2. The permittee shall equip and maintain EU-BT1FRAME with manual wipe applicators or comparable technology with equivalent transfer efficiency. (R 336.1702(a))
- 3. The permittee shall not operate EU-BT1PANEL unless the RTO is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 70 percent (by weight) of EU-BT1PANEL, minimum VOC destruction efficiency of 95 percent (by weight) and maintaining a minimum temperature of 1400°F, and a minimum retention time of 0.5 seconds, and operating and maintaining the control device with an approved MAP as required by SC III.4. (R 336.1225, R 336.1702(a), R 336.1910)
- 4. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner acceptable to the AQD District Supervisor, a temperature monitoring device in the RTO to monitor and record the temperature, on a continuous basis, during operation of EU-BT1PANEL. (R 336.1225, R 336.1702(a))

V. TESTING/SAMPLING

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

- 1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior 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. (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))
- 2. Within 180 days from the commencement of trial operation of EU-BT1PANEL, the permittee shall verify destruction efficiency of the RTO, by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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, including any modifications to the method in the

test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)

3. Within 180 days from the commencement of trial operation of EU-BT1PANEL, the permittee shall verify capture efficiency of EU-BT1PANEL, by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1224, R 336.1225, R 336.1702(a))
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (primer, coating, purge and cleanup solvents, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702(a))
- 3. The permittee shall keep the following information for EU-BT1PANEL and EU-BT1FRAME, each separately:
 - a) Gallons (with water and exempt solvents) of each VOC containing primer, coating, wipe, purge and cleanup solvents, etc. (material) used on a monthly basis.
 - b) VOC content (with water and exempt solvents) of each material, as applied, on a monthly basis.
 - c) VOC mass emission calculations determining the following:
 - i) The monthly emission rate in pounds per calendar month for EU-BT1FRAME,
 - ii) The monthly emission rate in tons per calendar month for EU-BT1FRAME and EU-BT1PANEL.
 - 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 EU-BT1PANEL and EU-BT1FRAME.

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

- 4. The permittee shall monitor and record, in a satisfactory manner, the temperature in the RTO, on a continuous basis, during operation of EU-BT1PANEL. 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 at the facility and make them available to the Department upon request. (R 336.1225, R 336.1702)
- 5. The permittee shall keep records of test results for SC V.2 and SC V.3 (destruction efficiency of RTO and capture efficiency of EU-BT1PANEL). The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1702(a))

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation,

construction, reconstruction, relocation, or modification is considered to occur no later than the commencement of trial operation of FG-BT1. (R 336.1201(7)(a))

VIII. STACK/VENT RESTRICTION(S)

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

S	Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
•	RTO J-BT1PANEL)	37	55	40 CFR 52.21 (c) & (d)

2. The exhaust gases from EU-BT1FRAME shall be released only into the general in-plant environment. (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, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products by the initial compliance date as applies to EU-BT1PANEL. (40 CFR Part 63, Subpart A and Subpart PPPP)
- 2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date as applies to EU-BT1FRAME. (40 CFR Part 63, Subpart A and Subpart MMMM)

Footnotes:

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

FG-RULE621 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b).

Emission Unit: EU-BT1FRAME (as of today)

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	30.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGRULE621	SC VI.3	R 336.1702(d)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1702)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, 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. (R 336.1702)
- 3. The permittee shall keep the following information on a calendar month basis for all metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b):

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- a) Gallons (with water and exempt solvents) or pounds of each VOC containing coating used and/or reclaimed.
- b) VOC content (with water and exempt solvents) of each coating as applied.
- c) VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.
- d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or 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. (R 336.1702(d))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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