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

November 15, 2021

PERMIT TO INSTALL 176-97E

ISSUED TOSummit Polymers, Inc.

LOCATED AT 4750 Executive Drive Portage, Michigan 49002

IN THE COUNTY OF
Kalamazoo

STATE REGISTRATION NUMBER N6261

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: October 21, 2021			
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:		
November 15, 2021			
DATE PERMIT VOIDED:	SIGNATURE:		
DATE PERMIT REVOKED:	SIGNATURE:		

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS	2
POLLUTANT / MEASUREMENT ABBREVIATIONS	3
GENERAL CONDITIONS	4
EMISSION UNIT SPECIAL CONDITIONS	6
EMISSION UNIT SUMMARY TABLE	6
EU-BASE-CLEAR	8
EUBOOTH31	12
EUBOOTH35_2	
FLEXIBLE GROUP SPECIAL CONDITIONS	19
FLEXIBLE GROUP SUMMARY TABLE	19
FGBOOTHS	20
FGBOOTH35	24
FGFACILITY CONDITIONS	27

Permit No. 176-97E

November 15, 2021 Page 2 of 30

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

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

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

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury Hour hr

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

PMParticulate Matter

PM10 Particulate Matter equal to or less than 10 microns in diameter 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 SO_2 Sulfur Dioxide

TAC **Toxic Air Contaminant**

Temp Temperature

THC Total Hydrocarbons Tons per year tpy Microgram μg

Micrometer or Micron μm

VOC Volatile Organic Compounds

Year yr

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 4 of 30

GENERAL CONDITIONS

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

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

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 5 of 30

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 Description				
	(Including Process Equipment & Control	Installation Date /	Flexible	
Emission Unit ID	Device(s))	Modification Date	Group ID	
EUBOOTH35_1	Coating booth using water-based and solvent- based coatings for plastic injection molded interior trim in automobiles. The booth uses	May 1, 2009 / March 18, 2016 / January 8, 2021	FGBOOTHS, FGBOOTH35	
	HVLP robotic applicators and has a flash zone and an infrared cure oven shared with EUBOOTH35_2. The booth has two stacks. The booth may be used in conjunction with EUBOOTH35_2 when multiple layers of coating are required.			
EUBOOTH35_2	Coating booth using water-based and solvent-based coatings for plastic injection molded interior trim in automobiles. The booth uses HVLP robotic applicators and has a flash zone and an infrared cure oven shared with EUBOOTH35_1. The booth has two stacks. The booth may be used in conjunction with EUBOOTH35_1 when multiple layers of coating are required.	January 8, 2021	FGBOOTH35	
EUBOOTH31_1	Coating booth using water-based and solvent-based coatings for plastic injection molded interior trim in automobiles. The booth uses HVLP robotic applicators and has a flash zone and an infrared cure oven shared with EUBOOTH31_2. The booth has two stacks. The booth may be used in conjunction with EUBOOTH31_2 as a coating line when multiple layers of coating are required.	December 1, 2014 / March 18, 2016	FGBOOTHS	
EUBOOTH31_2	Coating booth using water-based and solvent-based coatings for plastic injection molded interior trim in automobiles. The booth uses HVLP robotic applicators has a flash zone and an infrared cure oven shared with EUBOOTH31_1. The booth has two stacks. The booth may be used in conjunction with EUBOOTH31_1 as a coating line when multiple layers of coating are required.	December 1, 2014 / March 18, 2016	FGBOOTHS	
EUBOOTH31	Coating line consisting of two coating booths (EUBOOTH31_1 and EUBOOTH31_2), followed by a flash zone and infrared cure oven, using water- and solvent-based coatings for plastic injection molded interior trim in automobiles.	October 4, 2019	NA	

Summit Polymers, Inc. (N6261)
Permit No. 176-97E

November 15, 2021
Page 7 of 30

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EU-BASE-CLEAR	Coating line using water- and solvent-based coatings for plastic injection molded interior trim in automobiles. The booths use HVLP robotic applicators and an electric convection oven. These booths are controlled by a regenerative thermal oxidizer.	October 1, 2020	NA

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

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 8 of 30

EU-BASE-CLEAR EMISSION UNIT CONDITIONS

DESCRIPTION

Coating line using water- and solvent-based coatings for plastic injection molded interior trim in automobiles. The booths use HVLP robotic applicators and an electric convection oven. These booths are controlled by a regenerative thermal oxidizer.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Water wash systems to control particulate matter and RTO (coating portion).

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	VOCs	23.5 tpy	12-month rolling time period as determined at the end of each calendar month	EU-BASE- CLEAR	SC VI.3	R 336.1205(1)(a)(ii) R 336.1702(a)
2.	VOC, Acetone (CAS No. 67-64-1), and tert-Butyl Acetate (CAS No. 540-88-5) combined	40.0 tpy	12-month rolling time period as determined at the end of each calendar month	EU-BASE- CLEAR	SC VI.4	R 336.1224, R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste materials (that would generate air emissions) 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 336.1702)
- The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-BASE-CLEAR unless the RTO is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum capture efficiency of 80 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), maintaining a minimum temperature of 1,450°F, and a minimum retention time of 0.5 seconds. (R 336.1205(1)(a)(ii), R 336.1702(a), R 336.1910)

Summit Polymers, Inc. (N6261) Permit No. 176-97E

- 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 the temperature on a continuous basis during operation of EU-BASE-CLEAR. (R 336.1702(a), R 336.1910)
- 3. The permittee shall not operate EU-BASE-CLEAR unless the respective water wash particulate control systems are installed, maintained, and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1910)
- 4. The permittee shall equip and maintain each spray booth within EU-BASE-CLEAR with robotic HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702)

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-BASE-CLEAR, the permittee shall verify VOC capture efficiency across EU-BASE-CLEAR by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in the table below.

Pollutant	Test Method Reference	
VOC Capture Efficiency	40 CFR Part 51, Appendix M; 40 CFR Part 60, Appendix A	

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205, R 336.1225, R 336.1301, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21© & (d))

3. Within 180 days from the commencement of trial operation of EU-BASE-CLEAR, the permittee shall verify VOC destruction efficiency across EU-BASE-CLEAR by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in the table below.

Pollutant	Test Method Reference	
VOC Destruction Efficiency	40 CFR Part 51, Appendix M	

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205, R 336.1225, R 336.1301, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))

VI. MONITORING/RECORDKEEPING

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

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 10 of 30

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. (R 336.1224, R 336.1225, R 336.1702)

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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)
- 3. The permittee shall keep the following information on a monthly basis for EU-BASE-CLEAR:
 - a) Gallons (with water) of each coating and clean-up solvent used and reclaimed (where applicable).
 - b) VOC content (with water) of each coating as applied and each clean-up solvent as used.
 - c) VOC mass emission calculations determining the monthly emission rates in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

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

- 4. The permittee shall keep the following information on a monthly basis for EU-BASE-CLEAR:
 - a) Gallons (with water) of each coating and clean-up solvent used and reclaimed (where applicable).
 - b) VOC content (minus water and with water), acetone (CAS No. 67-64-1) content, and tert-butyl acetate (CAS No. 540-88-5) content of each coating as applied and each clean-up solvent as used.
 - c) VOC, acetone, and tert-butyl acetate mass emission calculations determining the monthly emission rates in tons per calendar month.
 - d) VOC, acetone, and tert-butyl acetate 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1702)

5. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the RTO on a continuous basis, during operation of EU-BASE-CLEAR. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request. (R 336.1702)

VII. REPORTING

NA

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	Minimum Height	Underlying
	Diameter / Dimensions	Above Ground	Applicable
	(inches)	(feet)	Requirements
1. SV-BC-RTO	36	40	R 336.1225, 40 CFR 52.21(c) & (d)

Summit Polymers, Inc. (N6261)
Permit No. 176-97E

November 15, 2021
Page 11 of 30

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EUBOOTH31 EMISSION UNIT CONDITIONS

DESCRIPTION

Coating line consisting of two coating booths (EUBOOTH31_1 and EUBOOTH31_2), followed by a flash zone and infrared cure oven, using water- and solvent-based coatings for plastic injection molded interior trim in automobiles.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Dry Filters (in each spray booth).

I. EMISSION LIMIT(S)

	Dalladand	1.2	Time Period /	-	Monitoring / Testing	Underlying Applicable
	Pollutant	Limit	Operating Scenario	Equipment	Method	Requirements
1.	VOCs		12-month rolling time period as determined at the end of each calendar month		SC VI.3	R 336.1702(a)
2.	VOC, Acetone (CAS No. 67-64-1), and tert- Butyl Acetate (CAS No. 540-88-5) combined	112.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUBOOTH31	SC VI.4	R 336.1224, R 336.1702(a)
3.	Glycol Ether DB (CAS No. 112-34-5)	1.27 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUBOOTH31	SC VI.5	R 336.1225(1)
4.	Diethyl Glycol Monobutyl Ether Acetate (CAS No. 124- 17-4)	1.01 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUBOOTH31	SC VI.6	R 336.1225(1)
5.	VOCs	5.0 lb/gal (minus water) ^a as applied	Daily Volume Weighted Average	EUBOOTH31	SC V.1, SC VI.3	R 336.1702(d)

The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))

II. MATERIAL LIMIT(S)

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 13 of 30

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702)

- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)
- 4. The permittee shall not operate the cure oven within EUBOOTH31 at a temperature in excess of 194°F. (R 336.1702(d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate EUBOOTH31 unless all respective exhaust filters are installed, maintained, and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1910)
- 2. The permittee shall equip and maintain each spray booth within EUBOOTH31 with robotic HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702)
- 3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the cure oven temperature of the cure oven within EUBOOTH31 on a continuous basis. (R 336.1702(d))

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))

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 15th 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)
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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)
- 3. The permittee shall keep the following information on a calendar day basis for EUBOOTH31:
 - a) Gallons (with water) of each coating and clean-up solvent used and reclaimed (where applicable).
 - b) VOC content (minus water and with water) of each coating as applied and each clean-up solvent as used.
 - c) Daily records of the VOC emission calculations determining the daily volume-weighted average VOC content of the coatings, as applied

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 14 of 30

- d) VOC mass emission calculations determining the monthly emission rates 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.

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1702)

- 4. The permittee shall keep the following information on a monthly basis for EUBOOTH31:
 - a) Gallons (with water) of each coating and clean-up solvent used and reclaimed (where applicable).
 - b) VOC content (minus water and with water), acetone (CAS No. 67-64-1) content, and tert-butyl acetate (CAS No. 540-88-5) content of each coating as applied and each clean-up solvent as used.
 - c) VOC, acetone, and tert-butyl acetate mass emission calculations determining the monthly emission rates in tons per calendar month.
 - d) VOC, acetone, and tert-butyl acetate 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1702)

- 5. The permittee shall keep the following information on a monthly basis for EUBOOTH31:
 - a) Gallons (with water) of each glycol ether DB (CAS No. 112-34-5) containing material used.
 - b) Where applicable, gallons (with water) of each glycol ether DB (CAS No. 112-34-5) containing material reclaimed.
 - c) The glycol ether DB (CAS No. 112-34-5) content (with water) in pounds per gallon of each material used.
 - d) Glycol ether DB (CAS No. 112-34-5) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) Glycol ether DB (CAS No. 112-34-5) 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225(1))

- 6. The permittee shall keep the following information on a monthly basis for EUBOOTH31:
 - a) Gallons (with water) of each diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) containing material used.
 - b) Where applicable, gallons (with water) of each diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) containing material reclaimed.
 - c) The diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) content (with water) in pounds per gallon of each material used.
 - d) Diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) Diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1225(1))

- 7. The permittee shall keep, in a satisfactory manner, continuous records of the cure oven temperature for EUBOOTH31 as required by SC IV.3. Continuous temperature data recording shall consist of instantaneous measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1702)
- 8. The permittee shall keep, in a satisfactory manner, daily records indicating when EUBOOTH31_1 and EUBOOTH31_2 operate as EUBOOTH31. 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)

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 15 of 30

VII. REPORTING

NA

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. SVBOOTH31_1_1	24	42	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVBOOTH31_1_2	24	42	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVBOOTH31_2_1	24	42	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVBOOTH31_2_2	24	42	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVBOOTH31_FLASH	16	42	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 16 of 30

EUBOOTH35_2 EMISSION UNIT CONDITIONS

DESCRIPTION

Coating booth using water-based and solvent-based coatings for plastic injection molded interior trim in automobiles. The booth uses HVLP robotic applicators and has a flash zone and an infrared cure oven shared with EUBOOTH35_1. The booth has two stacks. The booth may be used in conjunction with EUBOOTH35_1 when multiple layers of coating are required.

Flexible Group ID: FGBOOTH35

POLLUTION CONTROL EQUIPMENT

Dry Filters in each spray booth.

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	VOC, Acetone (CAS No. 67-64-1), and tert- Butyl Acetate (CAS No. 540-88-5) combined	60.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUBOOTH35_2	SC VI.3	R 336.1224, R 336.1702(a)
2.	VOCs	5.0 lb/gal (minus water) ^a as applied	Daily Volume Weighted Average	EUBOOTH35_2	SC V.1, SC VI.3	R 336.1702(d)

The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702)
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)
- 4. The permittee shall not operate the cure oven within EUBOOTH35_2 at a temperature in excess of 194°F. (R 336.1702(d))

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 17 of 30

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUBOOTH35_2 unless all respective exhaust filters are installed, maintained, and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1910)

- The permittee shall equip and maintain the spray booths with robotic HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702)
- 3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the temperature of the cure oven on a continuous basis. (R 336.1702(d))

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))

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 15th 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)
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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)
- 3. The permittee shall keep the following information on a calendar day basis for EUBOOTH35 2:
 - a) Gallons (with water) of each coating and clean-up solvent used and reclaimed (where applicable).
 - b) VOC content (minus water and with water), acetone (CAS No. 67-64-1) content, and tert-butyl acetate (CAS No. 540-88-5) content of each coating as applied and each clean-up solvent as used.
 - c) Daily records of the VOC emission calculations determining the daily volume-weighted average VOC content of the coatings, as applied.
 - d) VOC, acetone, and tert-butyl acetate combined mass emission calculations determining the monthly emission rates in tons per calendar month.
 - e) VOC, acetone, and tert-butyl acetate combined 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1702)

4. The permittee shall keep, in a satisfactory manner, continuous records of the cure oven temperature as required by SC IV.3. Continuous temperature data recording shall consist of instantaneous measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1702)

VII. REPORTING

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 18 of 30

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. SVBOOTH35_2_1	24	42.5	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVBOOTH35_2_2	24	42.5	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVBOOTH35_FLASH	16	42.5	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

Summit Polymers, Inc. (N6261) Permit No. 176-97E

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
FGBOOTHS	Three (3) booths for coating plastic injection molded interior trim. Each booth can use either water- or solvent-based coatings.	EUBOOTH35_1, EUBOOTH31_1, EUBOOTH31_2
FGBOOTH35	Two (2) booths for coating plastic injection molded interior trim used together for parts requiring multiple layers of coating. Each booth can use either water-or solvent-based coatings.	EUBOOTH35_1, EUBOOTH35_2

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 20 of 30

FGBOOTHS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Three (3) booths for coating plastic injection molded interior trim. Each booth can use either water- or solvent-based coatings.

Emission Unit: EUBOOTH35_1, EUBOOTH31_1, EUBOOTH31_2

POLLUTION CONTROL EQUIPMENT

Dry Filters in each spray booth.

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	VOCs	72.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGBOOTHS	SC VI.3	R 336.1702(a)
2.	VOC, Acetone (CAS No. 67-64-1), and tert- Butyl Acetate (CAS No. 540-88-5) combined	132.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGBOOTHS	SC VI.3	R 336.1224, R 336.1702(a)
3.	VOC, Acetone (CAS No. 67-64-1), and tert- Butyl Acetate (CAS No. 540-88-5) combined	60.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUBOOTH35_1, EUBOOTH31_1, EUBOOTH31_2, Each Separately	SC VI.4	R 336.1224, R 336.1702(a)
4.	Glycol Ether DB (CAS No. 112-34-5)	20.9 lb/24-hr ¹	Calendar Day	FGBOOTHS	SC VI.5	R 336.1225(1)
5.	Triethylamine (CAS No. 121-44-8)	7.3 lb/24-hr ¹	Calendar Day	FGBOOTHS	SC VI.6	R 336.1225(1)
6.	Formaldehyde (CAS No. 50-00-0)	152.6 lb/year ¹	12-month rolling time period as determined at the end of each calendar month	FGBOOTHS	SC VI.7	R 336.1225(1)
	VOCs	5.0 lb/gal (minus water) ^a as applied	Daily Volume Weighted Average	EUBOOTH35_1, EUBOOTH31_1, EUBOOTH31_2, Each Separately	SC V.1, SC VI.3	R 336.1702(d)

The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))

II. MATERIAL LIMIT(S)

1. The permittee shall not use any coatings containing Diethyl Glycol Monobutyl Ether Acetate (CAS No. 124-17-4) in EUBOOTH31 1 or EUBOOTH31 2.1 (R 336.1225(1))

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 21 of 30

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702)

- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)
- 4. The permittee shall not operate any of the cure ovens within FGBOOTHS at a temperature in excess of 194°F. (R 336.1702(d))

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

- 1. The permittee shall not operate EUBOOTH35_1, EUBOOTH31_1, or EUBOOTH31_2 unless all respective exhaust filters are installed, maintained, and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1910)
- The permittee shall equip and maintain each spray booth within FGBOOTHS with robots and HVLP applicators
 or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep
 test caps available for pressure testing. (R 336.1702)
- 3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the cure oven temperature of each cure oven within FGBOOTHS on a continuous basis. (R 336.1702(d))

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))

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 15th 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)
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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)

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 22 of 30

- 3. The permittee shall keep the following information on a calendar day basis for FGBOOTHS:
 - a) Gallons (with water) of each coating and clean-up solvent used and reclaimed (where applicable).
 - b) VOC content (minus water and with water), acetone (CAS No. 67-64-1) content, and tert-butyl acetate (CAS No. 540-88-5) content of each coating as applied and each clean-up solvent as used.
 - c) Daily records of the VOC emission calculations determining the daily volume-weighted average VOC content of the coatings, as applied, for EUBOOTH35_1, EUBOOTH31_1, and EUBOOTH31_2, each separately.
 - d) VOC mass emission calculations determining the monthly emission rates in tons per calendar month for each separately and combined.
 - e) VOC, acetone, and tert-butyl acetate combined mass emission calculations determining the monthly emission rates in tons per calendar month.
 - f) 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.
 - g) VOC, acetone, and tert-butyl acetate combined 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1702)

- 4. The permittee shall keep the following information on a monthly basis for EUBOOTH35_1, EUBOOTH31_2, and EUBOOTH31 2, each separately:
 - a) Gallons (with water) of each coating and clean-up solvent used and reclaimed (where applicable).
 - b) VOC content (minus water and with water), acetone (CAS No. 67-64-1) content, and tert-butyl acetate (CAS No. 540-88-5) content of each coating as applied and each clean-up solvent as used.
 - c) VOC, acetone, and tert-butyl acetate mass emission calculations determining the monthly emission rates in tons per calendar month.
 - d) VOC, acetone, and tert-butyl acetate 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1702)

- 5. The permittee shall keep the following information on a daily basis for FGBOOTHS:
 - a) Gallons (with water) of each glycol ether DB (CAS No. 112-34-5) containing material used.
 - b) Where applicable, gallons (with water) of each glycol ether DB (CAS No. 112-34-5) containing material reclaimed.
 - c) The glycol ether DB (CAS No. 112-34-5) content (with water) in pounds per gallon (or percent by weight and density) of each material used.
 - d) Glycol ether DB (CAS No. 112-34-5) mass emission calculations determining the daily emission rate in pounds per calendar day.

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1225(1))

- 6. The permittee shall keep the following information on a daily basis for FGBOOTHS:
 - a) Gallons (with water) of each triethylamine (CAS No. 121-44-8) containing material used.
 - b) Where applicable, gallons (with water) of each triethylamine (CAS No. 121-44-8) containing material reclaimed.
 - c) The triethylamine (CAS No. 121-44-8) content (with water) in pounds per gallon (or percent by weight and density) of each material used.
 - d) Triethylamine (CAS No. 121-44-8) mass emission calculations determining the daily emission rate in pounds per calendar day.

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1225(1))

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 23 of 30

- 7. The permittee shall keep the following information on a monthly basis for FGBOOTHS:
 - a) Gallons (with water) of each formaldehyde (CAS No. 50-00-0) containing material used.
 - b) Where applicable, gallons (with water) of each formaldehyde (CAS No. 50-00-0) containing material reclaimed.
 - c) The formaldehyde (CAS No. 50-00-0) content (with water) in pounds per gallon (or percent by weight and density) of each material used.
 - d) Formaldehyde (CAS No. 50-00-0) mass emission calculations determining the monthly emission rate in pounds per calendar month.
 - e) Formaldehyde (CAS No. 50-00-0) mass emission calculations determining the annual emission rate in pounds 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225(1))

- 8. The permittee shall keep, in a satisfactory manner, continuous records of the cure oven temperatures for EUBOOTH35_1, EUBOOTH31_1, and EUBOOTH31_2, each separately, as required by SC IV.3. Continuous temperature data recording shall consist of instantaneous measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1702)
- 9. The permittee shall keep, in a satisfactory manner, daily records indicating when EUBOOTH31_1 and EUBOOTH31_2 operate as EUBOOTH31. 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)

VII. REPORTING

NA

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. SVBOOTH35_1_1	24	42.5	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVBOOTH35_1_2	24	42.5	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVBOOTH31_1_1	24	42	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVBOOTH31_1_2	24	42	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVBOOTH31_2_1	24	42	R 336.1225, 40 CFR 52.21(c) & (d)
6. SVBOOTH31_2_2	24	42	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 24 of 30

FGBOOTH35 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two (2) booths for coating plastic injection molded interior trim used together for parts requiring multiple layers of coating. Each booth can use either water- or solvent-based coatings.

Emission Unit: EUBOOTH35_1, EUBOOTH35_2

POLLUTION CONTROL EQUIPMENT

Dry Filters in each spray booth.

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	VOCs	72.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGBOOTH35	SC VI.3	R 336.1702(a)
2.	Glycol Ether DB (CAS No. 112-34-5)	2,700 lb/year ¹	12-month rolling time period as determined at the end of each calendar month	FGBOOTH35	SC VI.4	R 336.1225(1)
3.	Diethyl glycol monobutyl ether acetate (CAS No. 124-17-4)	2,700 lb/year ¹	12-month rolling time period as determined at the end of each calendar month	FGBOOTH35	SC VI.5	R 336.1225(1)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702)
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702)
- 4. The permittee shall not operate the cure oven within FGBOOTH35 at a temperature in excess of 194°F. (R 336.1702(d))

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 25 of 30

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUBOOTH35_1 or EUBOOTH35_2 unless their respective exhaust filters are installed, maintained, and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1910)

- 2. The permittee shall equip and maintain each spray booth within FGBOOTH35 with robotic HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702)
- 3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the cure oven temperature of each cure oven within FGBOOTH35 on a continuous basis. (R 336.1702(d))

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))

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 15th 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)
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, 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)
- 3. The permittee shall keep the following information on a monthly basis for FGBOOTH35:
 - a) Gallons (with water) of each coating and clean-up solvent used and reclaimed (where applicable).
 - b) VOC content (minus water and with water) of each coating as applied and each clean-up solvent as used.
 - c) VOC mass emission calculations determining the monthly emission rates in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

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

- 4. The permittee shall keep the following information on a monthly basis for FGBOOTH35:
 - a) Gallons (with water) of each glycol ether DB (CAS No. 112-34-5) containing material used.
 - b) Where applicable, gallons (with water) of each glycol ether DB (CAS No. 112-34-5) containing material reclaimed.
 - c) The glycol ether DB (CAS No. 112-34-5) content (with water) in pounds per gallon (or percent by weight and density) of each material used.
 - d) Glycol ether DB (CAS No. 112-34-5) mass emission calculations determining the monthly emission rate in pounds per calendar month.
 - e) Glycol ether DB (CAS No. 112-34-5) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 26 of 30

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1225(1))

- 5. The permittee shall keep the following information on a monthly basis for FGBOOTH35:
 - a) Gallons (with water) of each diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) containing material used.
 - b) Where applicable, gallons (with water) of each diethyl glycol monobutyl ether acetate (CAS No. 124-1--4) containing material reclaimed.
 - c) The diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) content (with water) in pounds per gallon (or percent by weight and density) of each material used.
 - d) Diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) mass emission calculations determining the monthly emission rate in pounds per calendar month.
 - e) Diethyl glycol monobutyl ether acetate (CAS No. 124-17-4) mass emission calculations determining the annual emission rate in pounds 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225(1))

6. The permittee shall keep, in a satisfactory manner, continuous records of the cure oven temperatures for EUBOOTH35_1 and EUBOOTH35_2, each separately, as required by SC IV.3. Continuous temperature data recording shall consist of instantaneous measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1702)

VII. REPORTING

NA

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 & Ven	Di	num Exhaust Diameter / mensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOOTH35_	1_1	24	42.5	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVBOOTH35_	2_1	24	42.5	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVBOOTH35_	1_2	24	42.5	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVBOOTH35_	2_2	24	42.5	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVBOOTH35_	FLASH	16	42.5	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

FGFACILITY CONDITIONS

<u>**DESCRIPTION**</u>: The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

RTO (coating portion) on EU-BASE-CLEAR

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2.	Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
3.	VOCs	Less than 89 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)
4.	Ethylbenzene (CAS No. 100-41-4)	2.91 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.4	R 336.1225(2)
5.	Cumene (CAS No. 98-8-28)	0.33 tpy ¹	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.5	R 336.1225(2)

Summit Polymers, Inc. (N6261) Permit No. 176-97E

II. MATERIAL LIMIT(S)

	VOC Content		Time Period /		Monitoring / Testing	Underlying Applicable
Material	Range	Limit	Operating Scenario	Equipment	Method	Requirements
1. Group 1	0.00 - 1.41	1,985	12-month rolling time	EUBOOTH35_1,	SC VI.3	R 336.1205(1)(a)(ii)
Coatings	lb/gal as	gallons	period as determined	EUBOOTH35_2,		
	applied		at the end of each	EUBOOTH31_1,		
			calendar month	EUBOOTH31_2,		
				EUBOOTH31,		
	4 40 4 00		10 (1 11)	combined	001/10	D 000 4005(4)()(")
2. Group 2	1.42 – 1.82	8,000	12-month rolling time	EUBOOTH35_1,	SC VI.3	R 336.1205(1)(a)(ii)
Coatings	lb/gal as	gallons	period as determined	EUBOOTH35_2,		
	applied		at the end of each	EUBOOTH31_1,		
			calendar month	EUBOOTH31_2,		
				EUBOOTH31,		
2 Crave 2	1.83 – 2.50	10,250	10 manth malling times	combined EUBOOTH35 1,	SC VI.3	D 226 4205(4\/a\/;i)
3. Group 3 Coatings	1.83 – 2.50 lb/gal as	•	12-month rolling time period as determined	EUBOOTH35_1, EUBOOTH35_2,	SC VI.3	R 336.1205(1)(a)(ii)
Coaurigs	applied	gallons	at the end of each	EUBOOTH35_2,		
	applied		calendar month	EUBOOTH31_1,		
			Calendal Infoliti	EUBOOTH31_2,		
				Combined		
4. Group 4	2.51 - 2.77	28,000	12-month rolling time	EUBOOTH35 1,	SC VI.3	R 336.1205(1)(a)(ii)
Coatings	lb/gal as	gallons	period as determined	EUBOOTH35 2,	00 11.0	11 000.1200(1)(4)(1)
J J J J J J J J J J J J J J J J J J J	applied	ganone	at the end of each	EUBOOTH31 1,		
			calendar month	EUBOOTH31 2,		
				EUBOOTH31,		
				Combined		
5. Group 5	2.78 - 2.87	1,000	12-month rolling time	EUBOOTH35_1,	SC VI.3	R 336.1205(1)(a)(ii)
Coatings	lb/gal as	gallons	period as determined	EUBOOTH35_2,		
	applied		at the end of each	EUBOOTH31_1,		
			calendar month	EUBOOTH31_2,		
				EUBOOTH31,		
				Combined		
6. Group 6	2.88 – 4.26	2,000	12-month rolling time	EUBOOTH35_1,	SC VI.3	R 336.1205(1)(a)(ii)
Coatings	lb/gal as	gallons	period as determined	EUBOOTH35_2,		
	applied		at the end of each	EUBOOTH31_1,		
			calendar month	EUBOOTH31_2,		
				EUBOOTH31,		
				combined		

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 29 of 30

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 HAP content of any coating as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))

2. 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 336.1205(3))

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 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3))
- 2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each HAP containing material used.
 - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
 - d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))

- 3. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons or pounds of each VOC containing material used and, if applicable, reclaimed.
 - b) VOC content (with water) in pounds per gallon of each VOC containing material used.
 - c) Gallons (with water) of each of the following coatings groups used per 12-month rolling time period as determined at the end of each calendar month, each separately:
 - i. Group 1 Coatings
 - ii. Group 2 Coatings
 - iii. Group 3 Coatings
 - iv. Group 4 Coatings
 - v. Group 5 Coatings
 - vi. Group 6 Coatings
 - d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC 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 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 336.1205(1)(a), R 336.1205(3))

Summit Polymers, Inc. (N6261)

Permit No. 176-97E

November 15, 2021

Page 30 of 30

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

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1225(2))

- 5. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a) Gallons (with water) of each cumene (CAS No. 98-82-8) containing material used.
 - b) Where applicable, gallons (with water) of each cumene (CAS No. 98-82-8) containing material reclaimed.
 - c) The cumene (CAS No. 98-82-8) content (with water) in pounds per gallon of each material used.
 - d) Cumene (CAS No. 98-82-8) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) Cumene (CAS No. 98-82-8) 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 an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ (R 336.1225(2))

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).