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

July 1, 2020

PERMIT TO INSTALL 158-11C

TRMI, Inc.

LOCATED AT 100 Hill Brady Road Battle Creek, Michigan 49037

> IN THE COUNTY OF Calhoun

STATE REGISTRATION NUMBER N2354

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: January 28, 2020				
DATE PERMIT TO INSTALL APPROVED: July 1, 2020	SIGNATURE:			
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 State Registration Not

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

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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 Pegrees Fahrenheit

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury hr Hour

HP Horsepower Hydrogen Sulfide

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

NMOC Non-Methane Organic Compounds

NO_x Oxides of Nitrogen

ng Nanogram

PM Particulate Matter

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

pph Pounds per hour ppm Parts per million

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

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

scf Standard cubic feet

 $\begin{array}{ccc} \text{sec} & \text{Seconds} \\ \text{SO}_2 & \text{Sulfur Dioxide} \end{array}$

TAC Toxic Air Contaminant

Temp Temperature

THC Total Hydrocarbons tpy Tons per year Microgram

µm Micrometer or Micron

VOC Volatile Organic Compounds

yr Year

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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 conditions 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.

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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)

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EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUSTENCIL	Stencil cleaning station	12-01-2019	NA
EUSOL1	Soldering ventilation	04-01-2006 /	FGSOLDER
		PTI Issuance	
EUSOL2	Soldering ventilation 2	01-01-2009 /	FGSOLDER
		PTI Issuance	
EUSOL3	Soldering ventilation 1	07-01-2010 /	FGSOLDER
	-	PTI Issuance	
EUSOL4	Soldering ventilation 4	12-01-2018 /	FGSOLDER
		PTI Issuance	
EURFSOL1	Alpha telecore 63Sn/37Pb	01-01-2007 /	FGSOLDER
		PTI Issuance	
EURFSOL2	Soldering station - reflow	01-01-2007 / PTI Issuance	FGSOLDER
EURFSOL3	EURFSOL3 Soldering station - reflow		FGSOLDER
		PTI Issuance	
EURFSOL4	Soldering station - reflow	01-01-2010 /	FGSOLDER
		PTI Issuance	
EURFSOL5	Soldering station - reflow	01-01-2016 /	FGSOLDER
		PTI Issuance	
EURFSOL6	Soldering station - reflow	11-01-2016 /	FGSOLDER
		PTI Issuance	
EURFSOL7	Soldering station - reflow	01-01-2017 /	FGSOLDER
		PTI Issuance	
EUTOLTK	Toluene dip tank	12-01-2018 /	FGTOLUENE
		PTI Issuance	
EUTOLSQZBOTTLES	Toluene squeeze bottles	01-01-2000 /	FGTOLUENE
		PTI Issuance	
EUTOLELEPCOAT	Toluene solvent in elepcoat	01-01-2000 /	FGTOLUENE
		PTI Issuance	
EUIPASQZBOTTLES	Use of IPA squeeze bottles at various	01-01-2000 /	NA
	locations throughout the facility	PTI Issuance	
EUELEPCOAT1	Elepcoat 1	01-01-2000 /	FGELEPCOAT
		PTI Issuance	
EUELEPCOAT2	Elepcoat 2	03-01-2000 /	FGELEPCOAT
		PTI Issuance	
EUELEPCOAT3	Elepcoat 3	03-01-2000 /	FGELEPCOAT
		PTI Issuance	
EUELEPCOAT4	Elepcoat 4	04-01-2002 /	FGELEPCOAT
		PTI Issuance	
EUELEPCOAT5	Elepcoat 5	04-01-2002 /	FGELEPCOAT
		PTI Issuance	
EUELEPCOAT6	Elepcoat 6	04-01-2002 /	FGELEPCOAT
		PTI Issuance	
EUELEPCOAT7	Elepcoat 7	04-01-2002 /	FGELEPCOAT
		PTI Issuance	

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	Emission Unit Description	Installation Date /	
Emissis a Unit ID	(Including Process Equipment & Control	Modification	Flavible One on ID
Emission Unit ID	Device(s))	Date	Flexible Group ID
EUELEPCOAT8	Elepcoat 8	07-01-2004 /	FGELEPCOAT
FUELEBOOATO	Flores et 0	PTI Issuance 07-01-2004 /	FOELEBOOAT
EUELEPCOAT9	Elepcoat 9	PTI Issuance	FGELEPCOAT
EUELEPCOAT10	Elepcoat 10	07-01-2004 /	FGELEPCOAT
EUELEPCOATIO	Ејерсоат то	PTI Issuance	FGELEPCOAT
EUELEPCOAT11	Elepcoat 11	07-01-2004 /	FGELEPCOAT
EUELEPCOATTI	Elepcoat	PTI Issuance	FGELEPCOAT
EUELEPCOAT12	Elepcoat 12	07-01-2004 /	FGELEPCOAT
EUELEPCOATIZ	Elepcoat 12	PTI Issuance	FGELEPCOAT
EUELEPCOAT13	Elepcoat 13	06-01-2005 /	FGELEPCOAT
EUELEPCOATTS	Elepcoat 15	PTI Issuance	FGELEPCOAT
EUELEPCOAT14	Elepcoat 14	07-01-2015 /	FGELEPCOAT
EUELEPCOAT 14	Ејерсоат 14	PTI Issuance	FGELEPCOAT
EUELEPCOAT15	Elepcoat 15	10-01-2015 /	FGELEPCOAT
EUELEPCOAT 15	Elepcoat 15		FGELEPCOAT
FUEL EDOCATAC	Flancast 40	PTI Issuance	FOELEBOOAT
EUELEPCOAT16	Elepcoat 16	10-01-2015 /	FGELEPCOAT
EUELEPCOAT17	Flores 47	PTI Issuance 10-01-2015 /	FGELEPCOAT
EUELEPCOATT/	Elepcoat 17		FGELEPCOAT
EUPAINTLINE1	A point line wood to cost intoviou plactic	PTI Issuance	FGPAINTLINES
EUPAINTLINET	A paint line used to coat interior plastic automotive parts. The emission unit	11-28-2011	FGPAINTLINES
	consists of a booth, cure area and mixing		
	area and include emissions from purge		
	and cleanup. A robot operates only one		
	of the two HVLP spray guns at any given		
	time. The particulate emissions are		
	controlled by use of a water curtain.		
EUPAINTLINE2	A paint line used to coat interior plastic	07-19-2013	FGPAINTLINES
LOI AINTEINEZ	automotive parts. The emission unit	07 13 2013	1 OI AINTEINEO
	consists of a booth, cure area and mixing		
	area and include emissions from purge		
	and cleanup. A robot operates only one		
	of the two HVLP spray guns at any given		
	time. The particulate emissions are		
	controlled by use of a water curtain.		

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.

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EUSTENCIL EMISSION UNIT CONDITIONS

DESCRIPTION

Stencil cleaning station

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	5.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUSTENCIL	SC VI.2 SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste stencil materials and shall store them in closed containers. The permittee shall dispose of all waste stencil materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1225, R 336.1702(a))
- 2. The permittee shall handle all VOC and/or HAP containing stencil materials, 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 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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 stencil material, 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, R 336.1225, R 336.1702)

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, R 336.1225, R 336.1702)

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 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each stencil 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 336.1225, R 336.1702).

- 3. The permittee shall keep the following information on a calendar month basis for EUSTENCIL:
 - a) Gallons (with water) of each stencil material including clean-up solvents used and reclaimed.
 - b) VOC content (minus water and with water) of each stencil material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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, R 336.1702(a))

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation or modification of each emission unit of EUSTENCIL 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 not later than the commencement of trial operation of EUSTENCIL. (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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSTENCIL	14	29	R 336.1225,
(Stencil Stack)			40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

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EUIPA EMISSION UNIT CONDITIONS

DESCRIPTION

Use of IPA squeeze bottles at various locations throughout the facility

Flexible Group: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	26.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGIPA	SC VI.2 SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste IPA materials and shall store them in closed containers. The permittee shall dispose of all waste IPA materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1225, R 336.1702(a))
- 2. The permittee shall handle all VOC and/or HAP containing IPA materials, in a manner to minimize the generation of fugitive emissions. (R 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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 IPA material, 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, R 336.1225, R 336.1702)

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, R 336.1225, R 336.1702)

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2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each IPA 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 336.1225, R 336.1702).

- 3. The permittee shall keep the following information on a calendar month basis for FGIPA:
 - a) Gallons (with water) of each IPA material used and reclaimed.
 - b) VOC content (minus water and with water) of each IPA material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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, R 336.1702(a))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

 The exhaust gases from FGIPA shall be released only into the general in-plant environment. (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).

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FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

		Associated
Flexible Group ID	Flexible Group Description	Emission Unit IDs
FGSOLDER	11 soldering stations	EUSOL1, EUSOL2, EUSOL3, EUSOL4, EURFSOL1, EURFSOL2, EURFSOL3, EURFSOL4, EURFSOL5, EURFSOL6, EURFSOL7
FGTOLUENE	Toluene dip tank, toluene squeeze bottles, and toluene in elepcoat	EUTOLTK, EUTOLSQZBOTTLES, EUTOLELEPCOAT
FGELEPCOAT	17 Elepcoat units	EUELEPCOAT1, EUELEPCOAT2, EUELEPCOAT3, EUELEPCOAT4, EUELEPCOAT5, EUELEPCOAT6, EUELEPCOAT7, EUELEPCOAT8, EUELEPCOAT10, EUELEPCOAT11, EUELEPCOAT12, EUELEPCOAT13, EUELEPCOAT14, EUELEPCOAT15, EUELEPCOAT15, EUELEPCOAT16, EUELEPCOAT17
FGPAINTLINES	Two Paint lines used for coating interior plastic automotive parts and mixing area and include emissions from purge and cleanup	EUPAINTLINE1, EUPAINTLINE2

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FGSOLDER EMISSION UNIT CONDITIONS

DESCRIPTION

11 soldering stations.

Emission Units: EUSOL1, EUSOL2, EUSOL3, EUSOL4, EURFSOL1, EURFSOL2, EURFSOL3, EURFSOL4, EURFSOL5, EURFSOL6, EURFSOL7

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	VOC	12.1 tpy	12-month rolling time period as determined at the end of each calendar month	FGSOLDER	SC VI.2 SC VI.3	R 336.1702(a)
2.	di(ethylene glycol) hexyl ether (CAS No. 112-59-4)	0.82 tpy	12-month rolling time period as determined at the end of each calendar month	FGSOLDER	SC VI.4	R 336.1225(1)
3.	terpineol (CAS No. 8000-41-7)	0.07 tpy	12-month rolling time period as determined at the end of each calendar month	FGSOLDER	SC VI.4	R 336.1225(1)
4.	maleic acid, dibutyl ester (CAS No. 105-76-0)	0.07 tpy	12-month rolling time period as determined at the end of each calendar month	FGSOLDER	SC VI.4	R 336.1225(1)
5.	thixotropic agent (CAS No. 8001-78-3)	6.4 lb/month	12-month rolling time period as determined at the end of each calendar month	FGSOLDER	SC VI.4	R 336.1225(1)

II. MATERIAL LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario		Monitoring / Testing Method	Underlying Applicable Requirements
VOC content of solder enhancing material	6.9 lb/gal (minus water) ^a as applied	Instantaneous	Each emission unit of FGSOLDER	SC V.1	R 336.1702(a)

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))

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III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste solder enhancing materials and shall store them in closed containers. The permittee shall dispose of all waste solder enhancing materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1225, R 336.1702(a))

2. The permittee shall handle all VOC and/or HAP containing solder enhancing materials, in a manner to minimize the generation of fugitive emissions. (R 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

 The permittee shall determine the VOC content, water content and density of any solder enhancing material, 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, R 336.1225, R 336.1702)

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, R 336.1225, R 336.1702)
- 2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each solder enhancing 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 336.1225, R 336.1702)
- 3. The permittee shall keep the following information on a calendar month basis for FGSOLDER:
 - a) Gallons or pounds (with water) of each solder enhancing material used and reclaimed.
 - b) VOC content (minus water and with water) of each solder enhancing material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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, R 336.1225(1), R 336.1702(a))

- 4. The permittee shall keep the following information on a calendar month basis for FGSOLDER:
 - a) Gallons (with water) of each di(ethylene glycol) hexyl ether (CAS No. 112-59-4), terpineol (CAS No. 8000-41-7); maleic acid, dibutyl ester (CAS No. 105-76-0), and thixotropic agent (CAS No. 8001-78-3) (identified as "TAC_{Annual}") containing material used.
 - b) Where applicable, gallons (with water) of each TAC_{Annual} containing material reclaimed.
 - c) Each TAC_{Annual} content (with water) in pounds per gallon of each material used.
 - d) Each TAC_{Annual} mass emission calculations determining the monthly emission rate in pounds/tons per calendar month.
 - e) Each TAC_{Annual} mass emission calculations determining the annual emission rate in pounds/tons per 12-month rolling time period as determined at the end of each calendar month.

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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))

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. SVSOL	12	26	R 336.1225,
(Solder Station 1)			40 CFR 52.21(c) & (d)
2. SVSOL2	12	26	R 336.1225,
(Solder Station 2)			40 CFR 52.21(c) & (d)
3. SVSOL3	12	26	R 336.1225,
(Solder Station 3)			40 CFR 52.21(c) & (d)
4. SVSOL6	12	26	R 336.1225,
(Solder Station 4)			40 CFR 52.21(c) & (d)
5. SVNXT1	12	26	R 336.1225,
(Reflow Stack NXT1 Alpha Telecore 63Sn/37Pb)			40 CFR 52.21(c) & (d)
6. SVNXT2	12	26	R 336.1225,
(Soldering Station - Reflow)			40 CFR 52.21(c) & (d)
7. SVNXT3&4	12	26	R 336.1225,
(Soldering Station - Reflow)			40 CFR 52.21(c) & (d)
8. SVNXT3&6	12	26	R 336.1225,
(Soldering Station - Reflow)			40 CFR 52.21(c) & (d)
9. SVNXT5	12	26	R 336.1225,
(Soldering Station - Reflow)			40 CFR 52.21(c) & (d)
10. SVNXT7	12	26	R 336.1225,
(Soldering Station - Reflow)			40 CFR 52.21(c) & (d)
11. SVR3	12	26	R 336.1225,
(Soldering Station - Reflow)			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).

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FGTOLUENE EMISSION UNIT CONDITIONS

DESCRIPTION

Toluene dip tank, toluene squeeze bottles, and toluene in elepcoat.

Emission Units: EUTOLTK, EUTOLSQZBOTTLES, EUTOLELEPCOAT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	6.6 tpy	12-month rolling time period as determined at the end of each calendar month	FGTOLUENE	SC VI.2 SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste toluene materials and shall store them in closed containers. The permittee shall dispose of all waste stencil materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1225, R 336.1702(a))
- 2. The permittee shall handle all VOC and/or HAP containing toluene 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 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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 toluene material, 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, R 336.1225, R 336.1702)

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, R 336.1225, R 336.1702)

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2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each toluene 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 336.1225, R 336.1702).

- 3. The permittee shall keep the following information on a calendar month basis for FGTOLUENE:
 - a) Gallons (with water) of each toluene material used and reclaimed.
 - b) VOC content (minus water and with water) of each toluene material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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, R 336.1702(a))

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation or modification of each emission unit of EUTOLTK portion of FGTOLUENE 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 not later than the commencement of trial operation of EUTOLTK portion of FGTOLUENE. (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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVTOLTK	18	29	R 336.1225,
(Toluene Dip Tank Stack)			40 CFR 52.21(c) & (d)

2. The exhaust gases from toluene squeeze bottles operations and toluene solvent in elepcoat operation of FGTOLUENE shall be released only into the general in-plant environment. (R 336.1225, 40 CFR 52.21(c) & (d))

IX. OTHER REQUIREMENT(S)

NA

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FGELEPCOAT EMISSION UNIT CONDITIONS

DESCRIPTION

17 Elepcoat units.

Emission Units: NA

EUELEPCOAT1, EUELEPCOAT2, EUELEPCOAT3, EUELEPCOAT4, EUELEPCOAT5, EUELEPCOAT6, EUELEPCOAT7, EUELEPCOAT8, EUELEPCOAT9, EUELEPCOAT10, EUELEPCOAT11, EUELEPCOAT12, EUELEPCOAT13, EUELEPCOAT14, EUELEPCOAT15, EUELEPCOAT16, EUELEPCOAT17

POLLUTION CONTROL EQUIPMENT

NA

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

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	3.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGELPCOAT	SC VI.2 SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste elepcoat materials and shall store them in closed containers. The permittee shall dispose of all waste elepcoat materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1225, R 336.1702(a))
- 2. The permittee shall handle all VOC and/or HAP containing elepcoat 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 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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 elepcoat material, 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, R 336.1225, R 336.1702)

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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, R 336.1225, R 336.1702)

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each elepcoat 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 336.1225, R 336.1702).
- 3. The permittee shall keep the following information on a calendar month basis for FGELEPCOAT:
 - a) Gallons (with water) of each elepcoat material including clean-up solvents used and reclaimed.
 - b) VOC content (minus water and with water) of each elepcoat material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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, R 336.1702(a))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

1. The exhaust gases from FGELEPCOAT shall be released only into the general in-plant environment. (R 336.1225, 40 CFR 52.21(c) & (d))

IX. OTHER REQUIREMENT(S)

NA

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FGPAINTLINES FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two Paint lines used for coating plastic automotive parts and include emissions from purge and cleanup.

Emission Unit: EUPAINTLINE1, EUPAINTLINE2.

POLLUTION CONTROL EQUIPMENT

Water curtain to control particulate emissions

I. EMISSION LIMIT(S)

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1.	VOC (coating only)	17.18 tpy	12-month rolling time period as determined at the end of each calendar month	FGPAINTLINES	SC VI.2	R 336.1702(d)
2.	VOC (purge and cleanup)	7.02 tpy	12-month rolling time period as determined at the end of each calendar month	FGPAINTLINES	SC VI.3	R 336.1702(d)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall capture all waste coatings, thinners, thickeners, and purge 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(a))
- 2. The permittee shall handle all VOC/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(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate FGPAINTLINES unless the water curtain is installed, maintained, and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1910)
- 2. The permittee shall equip and maintain FGPAINTLINES with 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(a))

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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 and purge solvent, 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 336.1702(d))
- 2. The permittee shall keep the following information for coatings on a monthly basis for FGPAINTLINES:
 - a) Gallons (with water) of each coating used.
 - b) VOC content (with water) of each coating as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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(d))

- 3. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with FGPAINTLINES:
 - a) Gallons of each solvent used, reclaimed, or manifested and shipped off-site for disposal.
 - b) VOC content, in pounds per gallon, of each solvent used.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records 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(d))

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. SV-PAINTLINE1	24	37	R 336.1225,
(for EUPAINTLINE1)			40 CFR 52.21(c) & (d)
2. SV-PAINTLINE2	24	37	R 336.1225,
(for EUPAINTLINE2)			40 CFR 52.21(c) & (d)

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IX. OTHER REQUIREMENT(S)

NA

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FGFACILITY CONDITIONS

DESCRIPTION

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

NA

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

	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.	VOC	Less than 90.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC II.1 SC VI.3	R 336.1205(1)(a), R 336.1205(3)
4.	VOC	Less than* 30.0 tpy	12-month rolling time period as determined at the end of each calendar month	All plastic parts coating lines operating per the requirements of R336.1632(15)(a) in FGFACILITY	SC VI.5	R 336.1702(d)
*	Excludes purging and project cleanup					

II. MATERIAL LIMIT(S)

1. The permittee shall not use VOC containing material (material) in excess of the limits specified in the following table based upon 12-month rolling time period as determined at the end of each calendar month: (R 336.1205(1)(a))

Material Usage Group	Maximum VOC Content (in pounds per gallon)	Material Usage Limit (Gallons per 12-month rolling time period)	VOC Emissions in tpy
EUSTENCIL	6.5	1,540	5.0
FGSOLDER	7.0	3,500	12.3
FGTOLUENE	7.3	1,800	6.6
FGIPA	6.6	8,000	26.4
FGELEPCOAT	6.8	1,000	3.4
FGPAINTLINES coatings, as-applied	6.0	5,693	17.1
FGPAINTLINES purge solvents	6.7	1,200	4.0
		Total	74.7

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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))

- 1. The permittee shall determine the HAP content of any material 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 last 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 calendar month 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 or manifested and shipped off-site for disposal.
 - 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.

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 calendar month basis for FGFACILITY:
 - a) Gallons or pounds of each VOC containing material used.
 - b) Where applicable, gallons or pounds of each VOC containing material reclaimed or manifested and shipped off-site for disposal.
 - c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
 - 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 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))

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4. The permittee shall keep usage records to show compliance with the SC II.1, in a format acceptable to the AQD District Supervisor, indicating the types and amounts (in gallons) of materials used on a calendar month and 12-month rolling time period as determined at the end of each calendar month basis. The records must indicate the name of material, usage, and its VOC content. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(1)(a))

- 5. The permittee shall keep the following information on a calendar month basis for all plastic parts coating lines operating per the requirements of R 336.1632(15)(a) in FGFACILITY:
 - a) Type of parts painted (plastic only).
 - b) Gallons or pounds of each VOC containing coating used.
 - c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing coating used.
 - 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 from the coating of plastic parts.

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(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).