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

May 2, 2023

PERMIT TO INSTALL 32-22A

ISSUED TO
McLaren Performance Technologies

32233 West Eight Mile Road Livonia, Michigan 48152

IN THE COUNTY OF Wayne

STATE REGISTRATION NUMBER A8217

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 REQ	UIRED BY RULE 203:
February 10, 2023	
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:
May 2, 2023	
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD Air Quality Division

BACT Best Available Control Technology

CAA Clean Air Act

CAM Compliance Assurance Monitoring
CEMS Continuous Emission Monitoring System

CFR Code of Federal Regulations

COMS Continuous Opacity Monitoring System

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

EU Emission Unit FG Flexible Group

GACS Gallons of Applied Coating Solids

GC General Condition
GHGs Greenhouse Gases

HVLP High Volume Low Pressure*

ID Identification

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

MAP Malfunction Abatement Plan MSDS Material Safety Data Sheet

NA Not Applicable

NAAQS National Ambient Air Quality Standards

NESHAP National Emission Standard for Hazardous Air Pollutants

NSPS New Source Performance Standards

NSR New Source Review PS Performance Specification

PSD Prevention of Significant Deterioration

PTE Permanent Total Enclosure

PTI Permit to Install

RACT Reasonable Available Control Technology

ROP Renewable Operating Permit

SC Special Condition

SCR Selective Catalytic Reduction
SNCR Selective Non-Catalytic Reduction

SRN State Registration Number

TBD To Be Determined

TEQ Toxicity Equivalence Quotient

USEPA/EPA United States Environmental Protection Agency

VE Visible Emissions

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm Actual cubic feet per minute

BTU British Thermal Unit °C Degrees Celsius CO Carbon Monoxide

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

gr Grains

HAP Hazardous Air Pollutant

Hg Mercury
hr Hour
HP Horsepo

HP Horsepower Hydrogen Sulfide

kW Kilowatt

Ib 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

sec Seconds SUlfur Dioxide

TAC Toxic Air Contaminant

Temp Temperature
THC Total Hydrocarbons
tpy Tons per year
µg Microgram

μm Micrometer or Micron

VOC Volatile Organic Compounds

yr Year

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.

- 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 &	Installation Date / Modification	Flexible Group ID
` ' ' '		-
•	1990-2003	FG-TESTCELLSCC
A test cell with catalytic converters	1990-2003	FG-TESTCELLSCC
servicing as a primary control device.		
A test cell with catalytic converters	1990-2003	FG-TESTCELLSCC
	1990-2003	FG-TESTCELLSCC
	1990-2003	NA
		14/1
	2022	
	5-1-1087/	NA
		INA
. ,	4-23-2003	
	1000 2002	FG-TESTCELLSCC
	1990-2003	FG-TESTCELLSCC
	1000 0000	50 T50T0511 000
	1990-2003	FG-TESTCELLSCC
	1990-2003	FG-TESTCELLSCC
servicing as a primary control device.		
A test cell with catalytic converters	1990-2003	FG-TESTCELLSCC
servicing as a primary control device.		
A test cell with catalytic converters	1990-2003	FG-TESTCELLSCC
	(Including Process Equipment & Control Device(s)) A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with a maximum capacity of 1000 HP with catalytic converters servicing as a primary control device. A dynamometer cell with a catalytic converter servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device.	(Including Process Equipment & Control Device(s)) A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with a maximum capacity of 1990-2003, 2022 A test cell with catalytic converters servicing as a primary control device. A dynamometer cell with a catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters servicing as a primary control device. A test cell with catalytic converters 1990-2003 Servicing as a primary control device. A test cell with catalytic converters 1990-2003 Servicing as a primary control device. A test cell with catalytic converters 1990-2003 Servicing as a primary control device. A test cell with catalytic converters 1990-2003 Servicing as a primary control device. A test cell with catalytic converters 1990-2003

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.

EU-TESTCELLCC9 EMISSION UNIT CONDITIONS

DESCRIPTION

A test cell with a maximum capacity of 1000 HP.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Catalytic converters

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

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. CO	1.1 lb/gal	Hourly	EU-TESTCELLCC9	SC V.1	R 336.1205 (1)(a) and (3))
2. CO	58.0 tpy*	12-month rolling time period as determined at the end of each calendar month.	EU-TESTCELLCC9	SC VI.2	R 336.1205 (1)(a) and (3))

^{*}The annual CO limit is based on an emission factor of 1.1 pounds per gallon of fuel as specified in Special Condition No. I.1. The emission factor, along with the fuel-monitoring requirement shall be applied to each day to ensure compliance with the 12-month rolling averages.

Notes: The fuel-monitoring requirements are found in Special Condition VI.2, VI.3, and VI.4.

II. MATERIAL LIMIT(S)

- 1. The permittee shall not burn any fuel other than diesel, compressed natural gas (CNG) or liquefied petroleum gas (LPG) in EU-TESTCELLCC9. (R 336.1224, R 336.1225, R 336.1702)
- 2. The total combined fuel usage for EU-TESTCELLCC9 shall not exceed 100 gallons per hour with CNG measured as gasoline gallon equivalents. (R 336.1225)
- 3. The total combined fuel usage for EU-TESTCELLCC9 shall not exceed 1,000 gallons per calendar day with CNG measured as gasoline gallon equivalents. (R 336.1225)
- 4. The fuel usage for EU-TESTCELLCC9 shall not exceed 106,000 gallons per 12-month rolling time period with CNG measured as gasoline gallon equivalents, as determined at the end of each calendar month. (R 336.1205, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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

1. The permittee shall not operate EU-TESTCELLCC9 unless the test cell has a catalytic converter installed, maintained, and operated in a satisfactory manner. (R 336.1205 (1)(a) and (3), R 336.1225, R 336.1702 (a), R 336.1910)

- 2. The permittee shall install, calibrate, maintain and operate in satisfactory manner a device to continuously monitor and record the inlet temperature and catalyst bed temperature for the catalytic converter in EUTESTCELLCC9 during an engine test. (R 336.1910)
- 3. The permittee shall use the catalytic converters to assure compliance with the carbon monoxide limit. An excursion for non-compliance shall be 2 consecutive 1-hour block average catalyst bed temperature readings less than 230° C. This condition does not affect compliance with R 336.1301. (R 336.1910)

V. TESTING/SAMPLING

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

1. Within 180 days after a request by the Department, the permittee shall verify emission rates for CO from EU-TESTCELLCC9 by testing at the 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	
CO	40 CFR Part 60, Appendix A	

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 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 336.1225, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

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

- 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(a), 40 CFR 52.21(c) and (d))
- 2. The permittee shall keep the following information on a monthly basis for EU-TESTCELLCC9:
 - a) Record of the amount of each fuel used in gallons or gasoline gallon equivalents per month and 12-month rolling time period.
 - b) Calculations of the total combined fuel used in gasoline gallon equivalents for CNG and gallons for all other fuels per 12-month rolling time period as determined at the end of each calendar month.
 - c) CO emission calculations determining the monthly emission rate in tons per calendar month.
 - d) CO emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d))

- 3. The permittee shall keep the following information on a daily basis for EU-TESTCELLCC9:
 - a) Record of the amount of each fuel used in gallons or gasoline gallon equivalents per calendar day.
 - b) Calculations of the total combined fuel used in gallons (using gasoline gallon equivalents for CNG) per calendar day.

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

- 4. The permittee shall keep the following information on an hourly basis for EU-TESTCELLCC9:
 - a) Record of the amount of each fuel used in gallons or gasoline gallon equivalents per hour.
 - b) Calculations of the total combined fuel used in gallons (using gasoline gallon equivalents for CNG) per hour.

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

5. The permittee shall keep, in a satisfactory manner, continuous records of the inlet temperature and catalyst bed temperature for EU-TESTCELLCC9. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1910)

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-12	12.24	40.1	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-TESTCELL10 EMISSION UNIT CONDITIONS

DESCRIPTION

Test cell Number 10 with a catalytic converter servicing as a primary control device.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Catalytic Converter

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

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. CO	709.2 lb/day	Daily	EU-TESTCELL10	SC VI.3	R 336.1205(1)(a) and (3), 40 CFR 52.21(d)
2. CO	16 tpy	12-month rolling time period as determined at the end of each calendar month.	EU-TESTCELL10	SC VI.2	R 336.1205(1)(a) and (3), 40 CFR 52.21(d)

^{*}Limits are based on the worst-case controlled emission factors as determined by testing in condition V(1) and as follows:

CO = 1.45 lb/gal;

II. MATERIAL LIMIT(S)

- 1. The permittee shall burn only unleaded gasoline, diesel, kerosene, compressed natural gas (CNG), and liquid petroleum gas (LPG) in EU-TESTCELL10. (R 336.1205(1)(a) and (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d))
- 2. The fuel usage for EU-TESTCELL10 shall not exceed 489 total combined gallons per calendar day. (R 336.1205(1)(a) and (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d))
- 3. The fuel usage for EU-TESTCELL10 shall not exceed 22,069 total combined gallons per 12-month rolling time period as determined at the end of each calendar month. (R 336.1205(1)(a) and (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EU-TESTCELL10 with a catalytic converter. (R 336.1205(1)(a) and (3), R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21(c) and (d))

V. TESTING/SAMPLING

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

 The permittee shall verify emission rates for CO from EU-TESTCELL10 by testing at the owner's expense, in accordance with Department requirements. Testing should be performed no later than 1 year prior to the renewable operating permit renewal. Testing shall be performed using an approved EPA Method listed in the table below.

Pollutant	Test Method Reference	
CO	40 CFR Part 60, Appendix A	

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 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 336.1225, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a) and (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d))
- 2. The permittee shall keep the following information on a monthly basis for EU-TESTCELL10:
 - a) A record of the days of operation.
 - b) Total combined gallons used per month and 12-month rolling time period.
 - c) CNG and LPG use calculations determining the annual usage rate in gallons, converted from cubic feet, per 12-month rolling time period as determined at the end of each calendar month.
 - d) CO emission calculations determining the monthly emission rate in tons per calendar month.
 - e) CO emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(c) and (d))

- 3. The permittee shall keep the following information on a monthly basis for EU-TESTCELL10:
 - a) Daily fuel used calculations based upon the total combined gallons used divided by the number of days EU-TESTCELL10 operated during the calendar month.
 - b) Daily CO emission calculations based upon the monthly CO emissions divided by the number of days EU-TestCell10 operated during the calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) and (3), R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21(c) and (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-13	12	36	R 336.1225,
			R 336.2803,
			R 336.2804,
			40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-TESTCELLSCC	9 test cells with catalytic converters servicing as the	EU-TESTCELLCC2,
	primary control devices.	EU-TESTCELLCC3,
		EU-TESTCELLCC6,
		EU-TESTCELLCC8,
		EU-TESTCELLCC11,
		EU-TESTCELLCC12,
		EU-TESTCELLCC14,
		EU-TESTCELLCC15,
		EU-TESTCELLCC16

FG-TESTCELLSCC FLEXIBLE GROUP CONDITIONS

DESCRIPTION

9 test cells with catalytic converters servicing as the primary control devices.

Emission Unit: EU-TESTCELLCC2, EU-TESTCELLCC3, EU-TESTCELLCC6, EU-TESTCELLCC8, EU-TESTCELLCC11, EU-TESTCELLCC12, EU-TESTCELLCC14, EU-TESTCELLCC15, EU-TESTCELLCC16

POLLUTION CONTROL EQUIPMENT

Catalytic converters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. CO	0.59 lb/gal	Hourly	FG-TESTCELLSCC	SC V.1, SC V.2	R 336.1205(1)(a) and (3)
2. CO	133.4 tpy*	12-month rolling time period as determined at the end of each calendar month	FG-TESTCELLSCC	SC VI.1	R 336.1205(1)(a) and (3)
3. VOC	0.008 lb/gal	Hourly	FG-TESTCELLSCC	SC V.1, SC V.2	R 336.1205(1)(a) and (3)
4. VOC	1.8 tpy ^{**}	12-month rolling time period as determined at the end of each calendar month	FG-TESTCELLSCC	SC VI.2	R 336.1205(1)(a) and (3)

^{*}The annual CO limit is based on an emission factor of 0.59 pound per gallon of gasoline as specified in Special Condition No. I.1. The emission factor, along with the fuel-monitoring requirement shall be applied to each day to ensure compliance with the 12-month rolling averages.

Notes: The fuel-monitoring requirements are found in Special Condition VI.3.

II. MATERIAL LIMIT(S)

1. The permittee shall not burn any fuel other than unleaded gasoline in FG-TESTCELLSCC. (R 336.1205 (1)(a) and (3), R 336.1225, R 336.1702(a))

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
2. Fuel	2,000 gallons	Calendar Day	FG-TESTCELLSCC	SC VI.3	R 336.1205
					(1)(a) and (3),
					R 336.1225,
					R 336.1702(a)

^{**}The annual VOC limit is based on an emission factor on 0.008 pound per gallon of gasoline as specified in Special Condition No. I.3. The emission factor, along with the fuel-monitoring requirement shall be applied to each day to ensure compliance with the 12-month rolling averages.

Page 15 of 17 Permit No.32-22A Underlying Monitoring / Time Period / Testing **Applicable Operating Scenario** Method Requirements Material Limit **Equipment** FG-TESTCELLSCC 3. Fuel 450,000 SC VI.3 R 336.1205 12-month rolling time gallons period as determined (1)(a) and (3), at the end of each R 336.1225, calendar month R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate any test cell from FG-TESTCELLSCC unless each of the test cell has a catalytic converter installed, maintained, and operated in a satisfactory manner. (R 336.1205 (1)(a) and (3), R 336.1225, R 336.1702 (a), R 336.1910)
- 2. The permittee shall install, calibrate, maintain and operate in satisfactory manner a device to continuously monitor and record the inlet temperature and catalyst bed temperature for each catalytic converter in FG-TESTCELLSCC during an engine test. (R 336.1910)
- 3. The permittee shall use the catalytic converters to assure compliance with the carbon monoxide limit. An excursion for non-compliance shall be 2 consecutive 1-hour block average catalyst bed temperature readings less than 230° C. This condition does not affect compliance with R 336.1301. (R 336.1910)

V. TESTING/SAMPLING

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

1. Once, during the term of the ROP, the permittee shall verify emission rates for CO and VOCs from FG-TESTCELLSCC by testing at the owner's expense, in accordance with Department requirements. Testing should be performed no later than 1 year prior to the renewable operating permit renewal. Testing shall be performed using an approved EPA Method listed in the table below.

Pollutant	Test Method Reference		
CO	40 CFR Part 60, Appendix A		
VOCs	40 CFR Part 60, Appendix A		

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 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 336.1225, R 336.2001, R 336.2003, R 336.2004)

2. Within 180 days after a request by the Department, the permittee shall verify emission rates for any requested pollutants from FG-TESTCELLSCC by testing at the 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		
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules		
PM10 / PM2.5	40 CFR Part 51, Appendix M		
NO _x	40 CFR Part 60, Appendix A		
SO ₂	40 CFR Part 60, Appendix A		
CO	40 CFR Part 60, Appendix A		
VOCs	40 CFR Part 60, Appendix A		
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B;		
	40 CFR Part 63, Appendix A		
Sulfuric Acid Mist	40 CFR Part 60, Appendix A		
HAPs	40 CFR Part 63, Appendix A		

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 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 336.1225, R 336.2001, R 336.2003, R 336.2004)

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall keep, in a satisfactory manner, daily, monthly, and previous 12-month CO emission calculation records for FG-TESTCELLSCC. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1205 (1)(a) and (3))
- 2. The permittee shall keep, in a satisfactory manner, daily, monthly, and previous 12-month VOC emission calculation records for FG-TESTCELLSCC. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1205 (1)(a) and (3), R 336.1702 (a))
- 3. The permittee shall keep, in a satisfactory manner, daily, monthly, and previous 12-month fuel use records for FG-TESTCELLSCC. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1205 (1)(a) and (3), R 336.1225, R 336.1702 (a))
- 4. The permittee shall keep, in a satisfactory manner, continuous records of the inlet temperature and catalyst bed temperature for FG-TESTCELLSCC. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R 336.1910)

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-5	12	36	R 336.1225
2. SV-6	12	36	R 336.1225
3. SV-9	9.84	36	R 336.1225
4. SV-11	9.84	36	R 336.1225
5. SV-14	12	36	R 336.1225
6. SV-15	12	36	R 336.1225
7. SV-22	26X26	36	R 336.1225
8. SV-21	12	36	R 336.1225

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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