

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

August 7, 2024

**PERMIT TO INSTALL**  
92-24

**ISSUED TO**  
General Motors LLC Orion Assembly

**LOCATED AT**  
4555 Giddings Road  
Lake Orion, Michigan 48359

**IN THE COUNTY OF**  
Oakland

**STATE REGISTRATION NUMBER**  
B7227

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: <b>May 10, 2024</b>	
DATE PERMIT TO INSTALL APPROVED: <b>August 7, 2024</b>	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
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan 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
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	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
SO <sub>2</sub>	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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EURESS	Rechargeable Energy Storage System (RESS) assembly process for the assembly of electric vehicle battery modules and battery packs.	TBD	FGAUTOMACT

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.

**EURESS  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Rechargeable Energy Storage System (RESS) assembly process for the assembly of electric vehicle battery modules and battery packs.

**Flexible Group ID:** FGAUTOMACT

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. VOCs from Sealers/Adhesives	16.6 tpy	12-month rolling time period as determined at the end of each calendar month	EURESS	SC VI.3	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2810(2), R 336.2908(3)
2. VOCs from Clean-Up Materials	3.9 tpy	12-month rolling time period as determined at the end of each calendar month	EURESS	SC VI.4	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2810(2), R 336.2908(3)

**II. MATERIAL LIMIT(S)**

<b>Material</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. VOCs for Sealers/Adhesives	0.3 lb/gal (minus water) <sup>a</sup> as applied	Instantaneous	EURESS	SC V.1	R 336.1702(a), R 336.2810(2), R 336.2908
2. VOCs from Clean-Up Materials	7.0 lb/gal (with water) as used	Instantaneous	EURESS	SC VI.2	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2810(2), R 336.2908

<sup>a</sup> 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.

3. The permittee shall not manufacture more than 1,705,000 battery modules and 421,600 battery packs per rolling 12-month time period. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.2810, R 336.2908)**

4. The permittee shall not use more than 1,111 gallons of cleaning solvent per rolling 12-month rolling time period. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.2810, R 336.2908)**

**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 336.1225, R 336.1702(a))**

2. 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 336.1225, 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 VOC content, water content and density of any material as applied in EURESS, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of any sealer, adhesive, or deadener material shall be verified by testing using federal Reference Test Method 24. **(R 336.1702, R 336.2004, R 336.2040, R 336.2041, R 336.2810, R 336.2908)**

#### **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 336.1225, R 336.1702, R 336.2810, R 336.2908)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component used in EURESS. The data may consist of 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 monthly basis for each sealer, adhesive, or other coating material associated with EURESS:
  - a) Gallons (with water) of each material used.
  - b) VOC content (minus water and with water) of each 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 336.1702, R 336.2810, R 336.2908)**

4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up materials associated with EURESS:
  - a) Gallons of each material used and reclaimed.
  - b) VOC content, in pounds per gallon, of each material 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, R 336.2810, R 336.2908)**

5. The permittee shall keep the following information on monthly and rolling 12-month rolling time periods for EURESS:
  - a) Number of battery modules manufactured.
  - b) Number of battery packs manufactured.

The permittee shall keep all records on file and make them available to the Department upon request.  
**(R 336.1702, R 336.2810, R 336.2908)**

## **VII. REPORTING**

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EURESS. **(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:

NA

## **IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart IIII, as they apply to EURESS.  
**(40 CFR Part 63, Subpart A and Subpart IIII)**

### **Footnotes:**

<sup>1</sup> 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.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGAUTOMACT	Each new, reconstructed, or existing affected source as defined in Title 40 of the Code of Federal Regulations (CFR), Part 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts for new automobiles or new light duty trucks; AND/OR in which you choose to include, pursuant to 40 CFR 63.3082(c), any coating operations which apply coatings to new other motor vehicle bodies or body parts for new other motor vehicles; parts intended for use in new automobiles, new light duty trucks or new other motor vehicles; or aftermarket repair or replacement parts for automobiles, light duty trucks or other motor vehicles; and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c). This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.	EUPRETREAT, EUELPO, EUPRIMER, EUTOPCOAT, EUTUTONE, EUGLASSBOND, EUMISCSOLVENTS, EUSEALERS, EUFNLRPR2022, EURESS

## FGAUTOMACT FLEXIBLE GROUP CONDITIONS

**DESCRIPTION**

Each new, reconstructed, or existing affected source as defined in Title 40 of the Code of Federal Regulations (CFR), Part 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts for new automobiles or new light duty trucks; AND/OR in which you choose to include, pursuant to 40 CFR 63.3082(c), any coating operations which apply coatings to new other motor vehicle bodies or body parts for new other motor vehicles; parts intended for use in new automobiles, new light duty trucks or new other motor vehicles; or aftermarket repair or replacement parts for automobiles, light duty trucks or other motor vehicles; and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c). This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.

**Emission Unit:** EUPRETREAT, EUELPO, EUPRIMER, EUTOPCOAT, EUGLASSBOND, EUMISCSOLVENTS, EUSEALERS, EUFNLRPR2022, EURESS

**POLLUTION CONTROL EQUIPMENT**

RTO for EUELPO if complying with SC I.2 and I.5.b

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.30 lb per GACS	Calendar Month	New/Reconstructed-FGMACT with EUELPO	SC III.1, SC V.1, SC VI.3	40 CFR63.3090(a)
2. Organic HAP*	0.5 lb per GACS	Calendar Month	New/Reconstructed-FGMACT	SC III.1, SC V.1, SC VI.3	40 CFR63.3090(b)
3. Organic HAP	0.01 lb per lb of coating	Calendar Month	New/Reconstructed-SEALERS & ADHESIVES	SC III.1, SC V.1, SC VI.3	40 CFR63.3090(c)
4. Organic HAP	0.01 lb per lb of coating	Calendar Month	New/Reconstructed-Deadener Materials	SC III.1, SC V.1, SC VI.3	40 CFR63.3090(d)

- **FGMACT** includes Primer, Topcoat, Final Repair, Glass Bonding Primer, and Glass Bonding Adhesive operations plus all coatings and thinners, except for deadener materials and adhesive and sealers not part of glass bonding systems.
  - **FGMACT WITH EUELPO** also includes all Electrocoat operations in addition to all of the operations in FGAUTOMACT.
  - **SEALERS & ADHESIVES** include only adhesives and sealers that are not part of glass bonding systems.
- \* Permittee may choose to comply with this limit if the requirements of Condition No. I.5 is met.

5. The permittee may choose to comply with either SC I.1 or 2. SC I.2 may be chosen only if EUELPO meets either of the following requirements. **(40 CFR 63.3092, 40 CFR Part 63, Subpart III, Table 5)**
  - a) Each individual material added to EUELPO contains no more than 1.0 percent by weight of any organic HAP and no less than 0.10 percent by weight of any organic HAP in Table 5 of 40 CFR Part 63 Subpart III.
  - b) The emissions from all EUELPO bake ovens are captured and ducted to an oven RTO which achieves a minimum destruction efficiency of at least 95 percent (by weight).

## **II. MATERIAL LIMIT(S)**

NA

## **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by all coating operations for which an emission limit has been established under Special Conditions I.1 through I.4. The work practice plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented consistent with the requirements of 40 CFR 63.3094: The permittee shall comply with the applicable work practice plans at all times.
  - a) All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.
  - b) Spills of organic-HAP containing coatings, thinners, cleaning materials, and waste materials must be minimized.
  - c) Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
  - d) Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
  - e) Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.
  - f) Organic HAP emissions from cleaning and from purging of equipment associated with all coating operations subject to emission limits in Special Conditions I.1 through I.4 above must be minimized by addressing:
    - i. Vehicle body wipe pursuant to 40 CFR 63.3094(c)(1)(i).
    - ii. Coating line purging pursuant to 40 CFR 63.3094(c)(1)(ii).
    - iii. Coating system flushing pursuant to 40 CFR 63.3094(c)(1)(iii).
    - iv. Cleaning of spray booth grates pursuant to 40 CFR 63.3094(c)(1)(iv).
    - v. Cleaning of spray booth walls pursuant to 40 CFR 63.3094(c)(1)(v).
    - vi. Cleaning of spray booth equipment pursuant to 40 CFR 63.3094(c)(1)(vi).
    - vii. Cleaning of external spray booth areas pursuant to 40 CFR 63.3094(c)(1)(vii).
    - viii. Additional housekeeping measures pursuant to 40 CFR 63.3094(c)(1)(viii).

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g). **(40 CFR 63.3100(c), 40 CFR 63.4493(b) and (c))**

2. The work practice plan shall not become part of the facility's Renewable Operating Permit (ROP). Revisions to the work practice plan likewise do not represent revisions to the facility's ROP. Copies of the current work practice plan and any earlier plan developed within the past 5 years are required to be made available for inspection and copying by the AQD upon request. **(40 CFR 63.3094)**

## **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 perform the compliance demonstrations in accordance with 40 CFR 63.3150-3152, 40 CFR 63.3160-3161, 40 CFR 63.3170-3171, and 40 CFR 63.3173. **(40 CFR Part 63, Subpart IIII)**

2. The permittee shall determine the mass fraction of each organic HAP for each material used according to the procedures established under 40 CFR 63.3151(a)(1) through (5). The permittee may use USEPA Method ALT-017 as an alternative for any material used, after demonstrating that its use as an alternative test methodology for that material, has been approved by the USEPA pursuant to the requirements of 40 CFR 63.3151(a)(3) and 40 CFR 63.7. **(40 CFR 63.7, 40 CFR 63.3151)**

## **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period described in 40 CFR 63.3150-3151, 40 CFR 63.3160-3161, and 40 CFR 63.3170-3171. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3083 and ends on the last day of the month following the compliance date. If the initial date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next month. **(40 CFR 63.3150, 40 CFR 63.3160, 40 CFR 63.3170, 40 CFR 63.3083(a) and (b))**
2. The permittee shall keep all records as required by 40 CFR 63.3130 in the format and timeframes outlined in 40 CFR 63.3131. **(40 CFR 63.3152(c), 40 CFR 63.3163(j))**
3. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date, for each compliance period:
  - a) A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart IIII and the documentation supporting each notification and report. **(40 CFR 63.3130(a))**
  - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP for each coating, thinner and cleaning material, the density for each coating and thinner, and the volume fraction of coating solids for each coating. **(40 CFR 63.3130(b))**
  - c) Monthly records of the following:
    - i. For each coating or thinner used in FGMACT, or FGMACT with EUELPO, the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids. **(40 CFR 63.3130(c))**
    - ii. For each material used in EUSEALERS, the mass used in each month and the mass organic HAP content. **(40 CFR 63.3130(c))**
    - iii. Calculations of the organic HAP emission rate for FGMACT, or FGMACT with EUELPO, in pounds per gallon of applied coating solids. If permittee chooses to comply with the option identified in Special Condition I.5.a., a record of the weight fraction of each organic HAP in each material added to EUELPO. These calculations and records must include all raw data, algorithms, and intermediate calculations. If the "Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-018 (Docket ID No. OAR-2002-0093 and Docket ID No. A-2001-22), is used, all data input to this protocol must be recorded. If these data are maintained as electronic files, the electronic files, as well as any paper copies must be maintained. **(40 CFR 63.3130(c), 40 CFR 63.3163, 40 CFR 63.3173)**
    - iv. Calculation of the average monthly mass organic HAP content in pounds per pound of coating, for sealers/adhesives and deadener portions of EUSEALERS, each separately. **(40 CFR 63.3130(c), 40 CFR 63.3152)**
    - v. The name, volume, mass fraction organic HAP content and density of each cleaning material used. **(40 CFR 63.3130(d) - (f))**

## **VII. REPORTING**

1. For the emission rate without add-on controls, the permittee shall report a deviation, as specified in 40 CFR 63.3110(c)(6) and 40 CFR 63.3120(a)(6), as applicable, if the organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3090. **(40 CFR 63.3152(b))**
2. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4), 40 CFR 63.9(b) through (e) and (h), and an initial notification and a notification of compliance status as specified in 40 CFR 63.3110. **(40 CFR 63.3110)**

3. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.3120(a). The first time period covered by these reports shall be shortened so as to end on either June 30 or December 31, whichever comes first. These reports shall be due March 15 for the reporting period July 1 to December 31 and September 15 for the reporting period January 1 to June 30. **(40 CFR 63.3120(a))**
4. The permittee must submit the following:
  - a) Initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in 40 CFR 63.9(h) and 40 CFR 63.3110(c) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF). The applicable notification must be submitted by the deadline specified in this subpart, regardless of the method in which the reports are submitted. **(40 CFR 63.3120(e))**
  - b) On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for 1-year, whichever date is later, the semiannual compliance report required in 40 CFR 63.3920(a) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year begin submitting all subsequent reports via CEDRI. **(40 CFR 63.3120(f))**

#### **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:

NA

#### **IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart IIII for Surface Coating of Automobiles and Light Duty Trucks by the initial compliance date. **(40 CFR Part 63, Subparts A and IIII)**

#### **Footnotes:**

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