* Updated Application forms at end of document

From: Nowak, John (J.A.) <jnowak2@ford.com>
Sent: Wednesday, March 10, 2021 9:53 AM
To: EGLE-ROP
Cc: Streight, Robert (R.R.); Lauch, John (J.T.); Weis, Stephen (EGLE); Byrnes, Bob (EGLE)
Subject: SRN-A8650 - ROP RENEWAL Application - Ford-Michigan Assembly Plant
Attachments: A8650 Ford-MAP ROP Renewal Application Form FINAL 3-10-2021.pdf; A8650 FINAL 07-28-20 - PERMIT MARK-UP FOR TITLE V PERMIT RENEWAL 3-1-2021.doc; Ford-MAP - Operation and Maintenance Manual with CAM 10-2020.pdf; Ford-MAP - Auto MACT Solvent Management Plan.pdf

Please let us know if you need any additional information.

John A. Nowak
Michigan Assembly
Environmental Engineer
734-467-0902

EGLE

RENEWABLE OPERATING PERMIT
RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
A8650	3711	336112	MI-ROP-A8650-2016a	

Source Name
Ford Motor Company, Michigan Assembly Plant

Street Address
38303 Michigan Avenue

City	State	ZIP Code	County
Wayne	MI	48184	Wayne

Section/Town/Range (if address not available)

Source Description
Automobile and Light-Duty Truck Manufacturing

☐ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
Ford Motor Company	

Mailing address (☐ check if same as source address)
One American Road

City	State	ZIP Code	County	Country
Dearborn	MI	48126	Wayne	USA

☐ Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

SRN: A8650	Section Number (if applicable):

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name				Title
John Nowak				Plant Environmental Control Engineer
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
734-467-0902		jnowak2@ford.com		

Contact 2 Name (optional)				Title
Robert Streight				Air Policy Manager
Company Name & Mailing address (☐ check if same as source address)				
290 Town Center Drive, Suite 800				
City	State	ZIP Code	County	Country
Dearborn	MI	48126	Wayne	USA
Phone number		E-mail address		
313-845-8364		rstreigh@ford.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name				Title
Erik Williams				Site Manager
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
734-467-0225		Ewilli31@ford.com		

Responsible Official 2 Name (optional)				Title
Company Name & Mailing address (☐ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

☐ Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

SRN: A8650	Section Number (if applicable):

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.	
☒ Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	☐ Compliance Plan/Schedule of Compliance
☒ Mark-up copy of existing ROP using official version from the AQD website (required)	☐ Stack information
☐ Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	☐ Acid Rain Permit Initial/Renewal Application
☐ Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	☐ Cross-State Air Pollution Rule (CSAPR) Information
☐ MAERS Forms (to report emissions not previously submitted)	☐ Confidential Information
☐ Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	☒ Paper copy of all documentation provided (required)
☒ Compliance Assurance Monitoring (CAM) Plan	☒ Electronic documents provided (optional)
☒ Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	☐ Other, explain:

Compliance Statement	
This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	☒ Yes ☐ No
The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.	
If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.	

Name and Title of the Responsible Official (Print or Type)

Erik Williams, Site Manager

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

E/ Williams — 3-10-21

Signature of Responsible Official — **Date**

SRN: A8650	Section Number (if applicable):

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☒ Yes ☐ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68)	☐ Yes ☒ No
	If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☐ Yes ☒ No
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☐ Yes ☒ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form.	☐ Yes ☒ No
	Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy.	☒ Yes ☐ No
	Is a CAM plan included with this application?	☒ Yes ☐ No
	If a CAM Plan is included, check the type of proposed monitoring included in the Plan:	
	1. Monitoring proposed by the source based on performance of the control device, or	☒
	2. Presumptively Acceptable Monitoring, if eligible	☒
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☒ Yes ☐ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☐ Yes ☒ No
☒	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI**-PARTC	

SRN: A8650	Section Number (if applicable):

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☒ Yes ☐ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]
EU291-SEALERS	Sealer used for vehicle components not used in Michigan Assembly Plant products.	Rule 212(4)(1)	Rule 291
EUMAPEGEN	2004 131.6 HP Natural Gas-Fired Emergency Generator (East Side of Final for Security)	Rule 212(4)(c)	Rule 282(2)(g)

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: **AI-**

SRN: A8650	Section Number (if applicable):

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☒ Yes ☐ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No

Comments:
Changes due to consolidation of emission control equipment under FG-CONTROLS that covers EU-GUIDECOAT and EU-TOPCOAT that removed all concentrators and directs all emissions to regenerative thermal oxidizers (RTOs). Change made in accordance with FG-FACILITY, IX. OTHER REQUIREMENTS, 3. A notification describing the change was submitted to EGLE on November 4, 2019.

Other change is to add RICE MACT requirements for the natural gas-fired emergency generator that was activated at the facility. The generator engine was manufactured in September 2004. This unit was in storage until January 2018.

☐ Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: **AI-**

SRN: A8650	Section Number (if applicable):

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. If No, go to Part G. ☐ Yes ☒ No

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. ☐ Yes ☐ No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. ☐ Yes ☐ No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identity the stack(s) that were not reported on the applicable MAERS form(s). ☐ Yes ☐ No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. ☐ Yes ☐ No

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**

SRN: A8650	Section Number (if applicable):

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.

If Yes, identify the emission units in the table below. If No, go to Part H. ☐ Yes ☒ No

Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	**Emission Unit Description – *Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices***	**Date Emission Unit was Installed/ Modified/ Reconstructed**
☐ Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
☐ Rule 287(2)(c) surface coating line		
☐ Rule 290 process with limited emissions		

Comments:

A Rule 291 Source for the assembly of small parts for products assembled outside of the Michigan Assembly Plant is in place at the site. Rule 291 documentation for this emission unit is maintained at the site. This emission unit is identified in MAERS as EU-291-SEALERS.

☐ Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: **AI-**

SRN: A8650	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If Yes, answer the questions below.	☒ Yes ☐ No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If Yes, describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	☒ Yes ☐ No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If Yes, identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	☒ Yes ☐ No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If Yes, on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify each state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	☒ Yes ☐ No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If Yes, list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	☐ Yes ☒ No
H6. Does the source propose to add, change and/or delete **source-wide** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H7. Are you proposing to **streamline** any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	☐ Yes ☒ No

SRN: A8650	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of concentrators made under provisions of flexible permit provisions resulting in increased control efficiency in accordance with current permit requirements.

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of temperature monitoring requirements associated with the removal of concentrators described above.

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

SRN: A8650	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Removal of stacks associated with concentrator removal described above.	☒ Yes ☐ No
H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.	☒ Yes ☐ No
H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
☒ Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-**PARTH	

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: A8650	Section Number (if applicable):

1. Additional Information ID
AI-PARTC

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

The combined Operation and Maintenance Plan (O&M Plan) and Compliance Assurance Monitoring (CAM) Plan will be updated to reflect the latest formatting requirements specified by EGLE following finalization of the MAP/CAM Plan associated with Ford's Dearborn Truck Plant as part of the Ford-Rouge (A8648) Title V permit renewal.

Rather than update the Michigan Assembly Plant plans repeatedly, Ford proposes to wait and adopt the final format and requirements specified by EGLE in the Dearborn Truck Plant plan. This will minimize update and review efforts and ensure consistency between all Ford CAM plans.

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: A8650	Section Number (if applicable):

1. Additional Information ID
AI-PARTH

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

MAP previously had two 3-Wet spray booths associated with EU-GUIDECOAT and EU-TOPCOAT – Enamel #1 (E1) and Enamel #2 (E2). Enamel 1 has one basecoat (BC) and one clearcoat (CC) automation zone that are abated through two carbon concentrators (KCRs) prior to VOC destruction in a regenerative thermal oxidizer (RTO). Enamel 2 had the exhaust from the BC automation zone, Prime (Guidecoat) robot zone, and CC automation zone being discharged to four KCRs and an RTO.

Ford transitioned all abated booth automation zones into recirculated zones. This allows a 90% reduction in the volume of booth exhaust air requiring abatement. All EU-GUIDECOAT and EU-TOPCOAT spray zones previously controlled as well as one additional EU-GUIDECOAT Prime (Guidecoat) spray zone are now controlled. As such, VOC booth capture efficiency is expected to increase from previous levels and overall control efficiency is expected to increase with the removal of the carbon concentrator.

The bleed-air from all RFHs is routed directly to the two presently-operating booth RTOs for E1 and E2 by-passing and eliminating the existing KCRs. These two RTOs destroy the VOCs directly without the 5% to 10% VOC loss typically associated with the use of KCRs resulting in an increased abatement control factor for both the EU-GUIDECOAT and EU-TOPCOAT operations from previous levels.

The four concentrators, presently operating for E2, and the two concentrators supporting E1 will be decommissioned. This eliminates six KCRs from the present operation and prevents the reactivation of an additional three KCRs to support the expansion of booth abatement air volumes.

This project was performed in accordance with Special Condition 3 of FG-FACILITY IX on Permit 192-17. The process changes do not require an increase in the emission limits or performance levels specified in PTI 192-17 nor will the projects result in a reconstructed major source of hazardous air pollutants as defined in and subject to 40 C.F.R. §63.2 and §63.5(b)(3), National Emission Standard for Hazardous Air Pollutants.

No changes to existing testing, monitoring, record-keeping requirements or other compliance evaluation activities are required. The air toxics dispersion modeling will be updated as well as testing to verify the control system capture efficiency and RTO destruction efficiency following completion of the projects. In accordance with Special Conditions 3 and 4 of FG-FACILITY IX., Ford will maintain an updated demonstration that the air toxics impact from the changed emission units will continue to comply with the levels specified in Rule 336.1226 or Rule 336.1227.

The permit mark-up reflects the removal of the KCRs from the operation but retains all of the applicable monitoring and recordkeeping associated with the RTOs.

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

EFFECTIVE DATE: September 28, 2016
REVISION DATE: July 28, 2020

ISSUED TO

FORD MOTOR COMPANY

Michigan Assembly Plant

State Registration Number (SRN): A8650

LOCATED AT

38303 Michigan Avenue, Wayne, Wayne County, Michigan 48184

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-A8650-2016a

Expiration Date: September 28, 2021

Administratively Complete ROP Renewal Application
Due Between 3/28/2020 and 3/28/2021

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-A8650-2016a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

_____

April Wendling, Detroit District Supervisor

TABLE OF CONTENTS

AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**

- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**

- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**

2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**

3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**

4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
   a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
   c. Inspect, at reasonable times, any of the following:
      i. Any stationary source.
      ii. Any emission unit.
      iii. Any equipment, including monitoring and air pollution control equipment.
      iv. Any work practices or operations regulated or required under the ROP.
   d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.

5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**

7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**

8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any 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).[2] **(R 336.1370)**

10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:" [2] **(R 336.1301(1))**
    a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
    b. A limit specified by an applicable federal new source performance standard.

    The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
    a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.[1] **(R 336.1901(a))**
    b. Unreasonable interference with the comfortable enjoyment of life and property.[1] **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).[2] **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
    a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
    b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.[2] **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
    a. The applicable requirements are included and are specifically identified in the ROP.
    b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

    Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
    a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
    b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
    c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
    d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(8))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.

37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.[2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.[2] **(R 336.1201(8), Section 5510 of Act 451)**

45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.[2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.[2] **(R 336.1201(4))**

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

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
EU-PHOSPHATE	Pretreatment of vehicle surface to prepare it for E-coat including two phosphate boilers (Phosphate #1 and Phosphate #2), each rated at 16.75 MMBTU/hr.	6/13/94	FG-FACILITY FG-BOILERMACT
EU-ECOAT	Prime coating operations are performed in an electrodeposition tank followed by a curing oven and a dry filter scuff booth.	5/18/92	FG-FACILITY FG-CONTROLS FG-MACT
EU-SEALERS	Various sealer materials application stations/booths followed by a curing oven.	5/18/92	FG-FACILITY FG-CONTROLS
EU-GUIDECOAT	Manual and automatic guidecoat application, flash-off, curing and scuffing.	5/18/92	FG-FACILITY FG-CONTROLS FG-MACT
EU-TOPCOAT	Manual and automatic topcoat spray application and curing conducted in two parallel topcoat spray booths (Nos. 1 and 2) followed by two parallel topcoat ovens (Nos. 1 and 2) and a single dry filter topcoat scuff booth.	5/18/92	FG-FACILITY FG-CONTROLS FG-MACT
EU-MISCCOAT	Miscellaneous coating operations including Black Out and Cavity Wax, Glass Installation, and Final Repair.	5/18/92	FG-FACILITY FG-MACT
EU-PURGE&CLEAN	Solvents used for cleanup and purge of facility paint systems. A solvent recovery system is in place to recover solvents used in the purging of automatic spray guns. Also included is a manual body wipe.	5/18/92	FG-FACILITY FG-CONTROLS FG-MACT
EU-FLUIDFILL	Vehicle fluid fill includes fluids such as power steering fluid, antifreeze, transmission fluid, engine oil, windshield washer fluid, refrigerant, and gasoline.	1/1993	FG-FACILITY
EU-GASOLINETANKS	Two 20,000 gallon underground gasoline storage tanks each equipped with a conversion vent.	1/1993	FG-FACILITY
EU-BOILER#1	Steam and heat boiler fired by either landfill gas and/or natural gas at a maximum capacity of 54.9 MMBTU/hr.	1/1/62	FG-POWERHOUSE FG-BOILERMACT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-BOILER#2	Steam and heat boiler fired by either landfill gas and/or natural gas at a maximum capacity of 85.4 MMBTU/hr.	1/1/62	FG-POWERHOUSE FG-BOILERMACT
EU-BOILER#3	Steam and heat boiler fired by either landfill gas and/or natural gas at a maximum capacity of 85.4 MMBTU/hr.	1/1/62	FG-POWERHOUSE FG-BOILERMACT
EU-FHBOILER	Filterhouse Boiler, 8 MMBTU/hr	May 2018	FG-BOILERMACT
EU-ISAFP#1WEST	320 HP diesel-fired emergency fire pump	Installed prior to June 12, 2006	FG-CIRICEMACT
EU-ISAFP#2EAST	320 HP diesel-fired emergency fire pump	Installed prior to June 12, 2006	FG-CIRICEMACT
EU-WAPDIESEL	136 HP diesel-fired emergency fire pump	Installed prior to June 12, 2006	FG-CIRICEMACT
EU-FIREPUMP#1	302 HP diesel-fired emergency fire pump	Installed prior to June 12, 2006	FG-CIRICEMACT
EU-FIREPUMP#2	235 HP diesel-fired emergency fire pump	Installed prior to June 12, 2006	FG-CIRICEMACT
EU-MAPEGEN	131 HP natural gas-fired emergency generator built in September 2004	Restarted January 2018	FG-SIRICEMACT
EU-COLDCLEANER	Any existing cold cleaner (placed into operation prior to 7/1/79) or new cold cleaner (placed into operation after 7/1/79) that is exempt from NSR permitting by R 336.1281(h) or R 336.1285 (r)(iv).	Various	FG-COLDCLEANERS
EU-MARKINGINK	Any existing or future emission unit that emits air contaminants that are exempt from the requirements of R336.1201 pursuant to R336.1278 and R336.1287(c) including an ink marking of parts emission unit.	Various	FG-RULE 287(c)
EU-RULE 290	Any existing or future emission unit that emits air contaminants which are exempt from the requirements of R 336.1201 pursuant to R 336.1290.	Various	FG-RULE 290

EU-PHOSPHATE
EMISSION UNIT CONDITIONS

DESCRIPTION

Pretreatment of vehicle surface to prepare it for E-coat including two phosphate boilers (Phosphate #1 and Phosphate #2), each rated at 16.75 MMBTU/hr installed on June 13, 1994.

Flexible Group ID: FG-FACILITY, FG-BOILERMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The heat input capacity of each hot water heater portion of EU-PHOSPHATE shall not exceed a maximum of 99.9 MM BTU per hour.[2] **(40 CFR Part 60 Subpart Dc)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV00294/G18-001 – Phosphate System Water Heater	20.0^2	66.0^2	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2.SV00295/G18-003 – Phosphate System Water Heater	20.0^2	67.0^2	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SV00297/G7-002 – Phosphate Dip Tank	17.0^2	65.0^2	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
4. SV00298/G8-002 – Phosphate Dip Tank	30.0^2	65.0^2	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
5. SV00299/G9-002 – Phosphate Dip Tank	33.0^2	65.0^2	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
6. SV00300/G16-003 – Phosphate Dip Tank	17.0^2	65.0^2	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
7. SV00301/G16-002 – Phosphate Dip Tank	17.0^2	65.0^2	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
8. SV00300/H13003 – Phosphate Dip Tank	12.0[2]	65.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
9. SV00301/H15001 – Phosphate Dip Tank	12.0[2]	65.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc, as they apply to each hot water heater portion of EU-PHOSPHATE.[2] **(40 CFR Part 60 Subparts A & Dc)**

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-ECOAT
EMISSION UNIT CONDITIONS

DESCRIPTION

Prime coating operations are performed in an electrodeposition tank followed by a curing oven and a dry filter scuff booth.

Flexible Group ID: FG-FACILITY, FG-CONTROLS, FG-MACT

POLLUTION CONTROL EQUIPMENT

Regenerative thermal oxidizer (No. 1) control of VOC emissions from the electrodeposition tank and the curing oven.

Dry filter particulate controls on the scuff booth portion of EU-ECOAT.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-ECOAT unless the appropriate sections of FG-CONTROLS are installed, maintained and operated in a satisfactory manner. Satisfactory operation of FG-CONTROLS includes maintaining a minimum combustion chamber temperature of 1400°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1400°F based upon a three-hour rolling average.[2] **(R 336.1220(a), R 336.1225, R 336.1901)**

2. The permittee shall not operate the scuff booth portion of EU-ECOAT unless the dry filter particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the dry filter particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 3.[2] **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The VOC content, water content and density of the resin, pigment and additives, as added to the ECOAT tank, 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 the resin, pigment and additives as added to the ECOAT tank shall be verified by testing using federal Reference Test Method 24.[2] **(R 336.1220(a), R 336.2040, R 336.2041)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV00308/C17-001 – E-Coat Scuff Booth	54.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SV00309/C17-003 – E-Coat Scuff Booth	54.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SV00312/H9-005 – E-Coat Thermal Oxidizer No. 1	48.0[2]	65.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-SEALERS
EMISSION UNIT CONDITIONS

DESCRIPTION

Various sealer materials application stations/booths followed by a curing oven. Sealers include body sealer, closure sealer, bodyside PVC, and underbody PVC.

Flexible Group ID: FG-FACILITY, FG-MACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The VOC content of each sealer and adhesive shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Testing shall be conducted at representative time(s) and temperature(s) used to cure the related sealer or material in practice as provided by ASTM D2369-98, 1.4 and Note 3. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content of each sealer and adhesive shall be verified by testing.[2] **(R 336.1220(a), R 336.2040, R 336.2041)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV00007/F16-001 – Sealer Oven	30.0[2]	66.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SV00296/G-16-001 – Sealer Oven	48.0[2]	66.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-GUIDECOAT
EMISSION UNIT CONDITIONS

DESCRIPTION

Manual and automatic guidecoat application, flash-off, curing, and scuffing. Guidecoat includes anti-chip, exterior primer surfacer, interior primer surfacer, and door frame and pillar blackout that may be performed either in the Guidecoat Booth or in the Guidecoat portion of the 3-Wet (Topcoat) Booth.

Flexible Group ID: FG-FACILITY, FG-CONTROLS, FG-MACT

POLLUTION CONTROL EQUIPMENT

Carbon concentrators followed by a regenerative thermal oxidizers (No. 3 and No. 4) for control of VOC emissions from the EU-GUIDECOAT booth automatic sections, and a regenerative thermal oxidizer (No. 2) for control of VOC emissions from the EU-GUIDECOAT oven. Note that the regenerative thermal oxidizer (No. 3) also control VOC emissions the EU-TOPCOAT booth No. 1 automatic sections, regenerative thermal oxidizer (No. 4) also control VOC emissions the EU-TOPCOAT booth No. 2 automatic sections and that the regenerative thermal oxidizer (No. 2) also controls VOC emissions from the two EU-TOPCOAT ovens.

Water wash particulate controls on the spray booth portion of EU-GUIDECOAT.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-GUIDECOAT unless the appropriate sections of FG-CONTROLS are installed, maintained and operated in a satisfactory manner. Satisfactory operation of FG-CONTROLS includes maintaining a minimum combustion chamber temperature of 1400°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1400°F based upon a three-hour rolling average. .[2]
   (R 336.1225, R 336.1901, R 336.2908(3))

2. The permittee shall not operate the spray booth portions of EU-GUIDECOAT unless the water wash particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the water wash particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 3.[2] **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The VOC content, water content and density of any coating or material as applied and as received, 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 AQD District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24.[2] **(R 336.2040, R 336.2041, R 336.2908(3))**

2. At least once every five years, unless the permittee has submitted a demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify the overall transfer efficiency and the oven exhaust control device VOC loading of EU-GUIDECOAT, by testing at owner's expense, in accordance with Department requirements, 40 CFR 51 Appendix M, and the U.S. EPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R336.2001)**

3. At least once every five years, unless the permittee has submitted a demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify the capture efficiency of the spray booths and ovens to the VOC control device(s) of EU-GUIDECOAT, by testing at owner's expense, in accordance with Department requirements, and the U.S. EPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R336.2001)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 when the Guidecoat Booth is in operation:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV00114/P-3 – Guidecoat Spraybooth	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SV00115/P-2 – Guidecoat Spraybooth	44.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SV00116/P-1 – Guidecoat Spraybooth	38.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
4. SV00117/P-4 – Guidecoat Spraybooth	54.0[2]	108.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
5. SV00118/P-5 – Guidecoat Spraybooth	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
6. SV00119/P-6 – Guidecoat Spraybooth	54.0[2]	108.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
7. SV00120/A5-011 – Regenerative Thermal Oxidizer (RTO) No. 2 for Guidecoat and Topcoat 1 & 2 Ovens	62.0[2]	75.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
8.			
9. SV00122/PB-005 – Regenerative Thermal Oxidizer (RTO) No. 3 for Guidecoat and Topcoat 1 Spraybooths	48.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-TOPCOAT
EMISSION UNIT CONDITIONS

DESCRIPTION

Manual and automatic topcoat spray application and curing conducted in two parallel topcoat spray booths (Nos. 1 and 2) followed by two parallel topcoat ovens (Nos. 1 and 2) and a single dry filter topcoat scuff booth. This operation may be conducted either as a stand-alone topcoat operation or in conjunction with EU-Guidecoat in a 3-Wet (Topcoat) booths.

Flexible Group ID: FG-FACILITY, FG-CONTROLS, FG-MACT

POLLUTION CONTROL EQUIPMENT

Regenerative thermal oxidizer (No. 3) for control of VOC emissions from the EU-TOPCOAT booth No. 1 automatic sections; regenerative thermal oxidizer (No. 4) for control of VOC emissions from the EU-TOPCOAT booth No. 2 automatic sections; and a regenerative thermal oxidizer (No. 2) for control of VOC emissions from the EU-TOPCOAT ovens. Note that the regenerative thermal oxidizers (No. 3 and No. 4) also control VOC emissions the EU-GUIDECOAT booth automatic sections and that the regenerative thermal oxidizer (No. 2) also controls VOC emissions from the EU-GUIDECOAT oven.

Dry filter particulate controls on the scuff booth portion of EU-TOPCOAT. Water wash particulate controls on spray booth portions of EU-TOPCOAT.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-TOPCOAT unless the appropriate sections of FG-CONTROLS are installed, maintained and operated in a satisfactory manner. Satisfactory operation of FG-CONTROLS includes maintaining a minimum combustion chamber temperature of 1400°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1400°F based upon a three-hour rolling average. .[2]
   (R 336.1225, R 336.1901, R 336.2908(3))

2. The permittee shall not operate the spray booth portions of EU-TOPCOAT unless the water wash particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the water wash

particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 3.[2] **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The VOC content, water content and density of any coating or material as applied and as received, 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 AQD District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24.[2] **(R 336.2040, R 336.2041, R 336.2908(3))**

2. At least once every five years, unless the permittee has submitted a demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify the overall transfer efficiency and the oven exhaust control device VOC loading of EU-TOPCOAT, by testing at owner's expense, in accordance with Department requirements, 40 CFR 51 Appendix M, and the U.S. EPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R336.2001)**

3. At least once every five years, unless the permittee has submitted a demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify the capture efficiency of the spray booths and ovens to the VOC control device(s) of EU-TOPCOAT, by testing at owner's expense, in accordance with Department requirements, and the U.S. EPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R336.2001)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep the following information on a monthly basis for EU-TOPCOAT:
   a. The uncontrolled total formaldehyde content of each basecoat coating as applied.
   b. The uncontrolled total formaldehyde content of each clearcoat coating as applied.

   The permittee shall keep the records on file, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request.[1] **(R 336.1225, R 336.1901)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV00139/E-4 – Topcoat #1 Spraybooth (Start-Up/Bypass Stack)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SV00128/E-1 – Topcoat #1 Spraybooth	38.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SV00129/E-2 – Topcoat #1 Spraybooth (Maint. Mode/Bypass Stack)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
4. SV00130/E-14 – Topcoat #1 Spraybooth	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
5. SV00131/E13 – Topcoat #1 Spraybooth (Abandoned)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
6. SV00132/E7 – Topcoat #1 Spraybooth (Abandoned)	54.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
7. SV00133/E-8 – Topcoat #1 Spraybooth	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
8. SV00134/E-12 – Topcoat #1 Spraybooth (Maint. Mode)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
9. SV00135/E-10 – Topcoat #1 Spraybooth (Maint. Mode)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
10. SV00136/E-9 – Topcoat #1 Spraybooth (Start-Up)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
11. SV00137/E-11 – Topcoat #1 Spraybooth	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
12. SV00138/E-5 – Topcoat #1 Spraybooth (Maint. Mode/Bypass Stack)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
13. SV00140/E-6 – Topcoat #1 Spraybooth (Start-Up)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
14. SV00141/E-3 – Topcoat #1 Spraybooth	54.0[2]	96.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
15. SV00174/TT-3 – Topcoat #2 Spraybooth (Maint. Mode/Bypass Stack)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
16. SV00176/TT-1 – Topcoat #2 Spraybooth	38.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
17. SV00177/TT-2 – Topcoat #2 Spraybooth	38.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
18. SV00178/TT-7 – Topcoat #2 Spraybooth	38.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
19. SV00179/TT-11 – Topcoat #2 Spraybooth (Maint. Mode/Bypass Stack)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
20. SV00185/TT-10 – Topcoat #2 Spraybooth	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
21. SV00180/TT-5 – Topcoat #2 Spraybooth (Maint. Mode)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
22. SV00181/TT-9 – Topcoat #2 Spraybooth (Maint. Mode)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
23. SV00182/TT-8 – Topcoat #2 Spraybooth (Start-Up)	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
24. SV00183/TT-4 – Topcoat #2 Spraybooth	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
25. SV00184/TT-6 – Topcoat #2 Spraybooth	54.0[2]	107.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
26. SV00302/B4-002 – Topcoat Scuff Booth	66.0[2]	75.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
27. SV00303/B5-002 – Topcoat Scuff Booth	66.0[2]	75.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
28. SV00120/A5-011 – Regenerative Thermal Oxidizer (RTO) No. 2 for Guidecoat and Topcoat 1 & 2 Ovens	62.0[2]	75.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
29.			
30. SV00122/PB-005 – Regenerative Thermal Oxidizer (RTO) No. 3 for Guidecoat and Topcoat #1 Spraybooths	48.0[2]	95.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
31.			

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
32. SV00260/PB-007 – Regenerative Thermal Oxidizer (RTO) No. 4 for Guidecoat and Topcoat #2 Spraybooths	48.0[2]	75.0[2]	**R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall not use any basecoat coating that exceeds an uncontrolled total formaldehyde content of 0.09 pounds per gallon as applied. The permittee shall not use any clearcoat coating that exceeds an uncontrolled total formaldehyde content of 0.15 pounds per gallon as applied. The uncontrolled total formaldehyde content is defined as the total of free formaldehyde in the coating formulation and any additional formaldehyde liberated from the melamine formaldehyde resin during curing, without any reduction for add-on VOC control equipment being taken.[1] **(R 336.1225, R 336.1901)**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-MISCCOAT
EMISSION UNIT CONDITIONS

DESCRIPTION
Miscellaneous coating operations including Black Out and Cavity Wax, Glass Installation, and Final Repair.

Flexible Group ID: FG-FACILITY, FG-MACT

POLLUTION CONTROL EQUIPMENT

Dry filter particulate controls on the spray booth portions of EU-MISCCOAT.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booth portions of EU-MISCCOAT unless the dry filter particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the dry filter particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 3.[2] **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING
Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The VOC content, water content and density of any sealer and adhesive as applied and as received, 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 AQD District Supervisor, the VOC content, water content and density of any sealer and adhesive shall be verified using federal Reference Test Method 24.[2] **(R 336.2040, R 336.2041, R 336.2908(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING
Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV00304/P11-001 – Final Repair Spray Booth/Oven	36.0[2]	66.0[2]	**R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SV00305/P11-002 – Final Repair Spray Booth/Oven	36.0[2]	66.0[2]	**R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SV00306/P11-003 – Final Repair Spray Booth/Oven	36.0[2]	66.0[2]	**R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
4. SV00307/P11-004 – Final Repair Spray Booth/Oven	36.0[2]	66.0[2]	**R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
5. SV00290/B9-001 – Blackout and Cavity Wax Booth	55.0[2]	75.0[2]	**R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
6. SV00291/B9-003 – Blackout and Cavity Wax Booth	55.0[2]	75.0[2]	**R 336.1901, R 336.2803, R 336.2804, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU–PURGE&CLEAN
EMISSION UNIT CONDITIONS

DESCRIPTION

Solvents used for cleanup and purge of facility paint systems. A solvent recovery system is in place to recover solvents used in the purging of automatic spray guns. Also, included is a manual body wipe.

Flexible Group ID: FG-FACILITY, FG-CONTROLS, FG-MACT

POLLUTION CONTROL EQUIPMENT

VOC emissions from the controlled portions of the coating lines are controlled by FG-CONTROLS.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The VOC content, water content and density of any solvent as applied and as received, 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 AQD District Supervisor, the VOC content, water content and density of any solvent shall be verified using federal Reference Test Method 24.[2] **(R 336.2040, R 336.2041, R 336.2908(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-FLUIDFILL
EMISSION UNIT CONDITIONS

DESCRIPTION

Vehicle fluid fill includes fluids such as power steering fluid, antifreeze, transmission fluid, engine oil, windshield washer fluid, refrigerant, and gasoline.

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**
NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-GASOLINETANKS
EMISSION UNIT CONDITIONS

DESCRIPTION

Two 20,000 gallon underground gasoline storage tanks each equipped with a conversion vent.

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT

A conservation vent per tank.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not add gasoline to, store gasoline in, or remove gasoline from either of the two 20,000 underground gasoline storage tanks unless their respective conservation vents are installed and operating properly.[2] **(R 336.1225, R 336.1702, R 336.1910, R 336.2908(3))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

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-FACILITY	This flexible group covers equipment used for automotive stamping, assembly, and painting operations for the entire Michigan Assembly Plant.	EU-PHOSPHATE, EU-ECOAT, EU-SEALERS, EU-GUIDECOAT, EU-TOPCOAT, EU-MISCCOAT. EU-PURGE&CLEAN EU-FLUIDFILL, EU-GASOLINETANKS
FG-CONTROLS	Regenerative thermal oxidizers used for control of VOC emissions from the paint spray booths and curing ovens.	EU-ECOAT, EU-GUIDECOAT, EU-TOPCOAT EU-PURGE&CLEAN
FG-MACT	Each new, reconstructed, or existing affected source as defined in 40 CFR 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts, 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) is subject to the requirements of 40 CFR 63 Subpart IIII. This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.	EU-ECOAT, EU-SEALERS, EU-GUIDECOAT, EU-TOPCOAT, EU-MISCCOAT. EU-PURGE&CLEAN
FG-BOILERMACT	This Flexible Group establishes the national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP as found in 40 CFR 63, Subpart DDDDD.	EU-PHOSPHATE, EU-FHBOILER, EU-BOILER #1, EU-BOILER #2, EU-BOILER #3
FG-CIRICEMACT	40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition RICE less than 500 bhp.	EU-ISAFP#1WEST EU-ISAFP#2EAST EU-WAPDIESEL EU-FIREPUMP#1 EU-FIREPUMP#2

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-SIRICEMACT	40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, spark ignition RICE greater than 300 bph and less than 500 bhp.	EUMAPEGEN
FG-POWERHOUSE	Three steam and heat boilers fired by either landfill gas and/or natural gas.	EU-BOILER #1, EU-BOILER #2, EU-BOILER #3
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EU-ColdCleaner
FG-RULE 287(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c).	EU-MARKINGINK
FG-RULE 290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	EU-Rule 290

FG-FACILITY
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group covers equipment used for automotive stamping, assembly, and painting operations for the entire Michigan assembly Plant.

Emission Units: All emission units and flexible groups associated with automotive stamping, assembly, and painting operations.

POLLUTION CONTROL EQUIPMENT

Regenerative thermal oxidizers used for control of VOC emissions from portions of the painting operations and curing ovens. Water wash or dry filter particulate controls in the paint spray booths.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	903.0[2] tpy	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC VI.1	**R 336.1225, R 336.1901 R 336.2908(3)**
2. VOC	4.8[2] pounds per job	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC VI.1	**R 336.1225, R 336.1901 R 336.2908(3)**
3. PM10	7.75 tpy[2,A]	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC V.1 SC VI.1	**R 336.1205, R 336.2803, R 336.2804, R 336.2810**
4. PM2.5	7.75 tpy[2,A]	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC V.1 SC VI.1	**R 336.1205, R 336.2803, R 336.2804, R 336.2810**
5. NOx	81.5 tpy[2,B]	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC V.2 SC VI.1	**R 336.1205, R 336.2803, R 336.2804, R 336.2810**
6. CO	68.5 tpy[2,B]	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC V.2 SC VI.1	**R 336.1205, R 336.2804, R 336.2810**
7. SO_2	2.0 tpy[2,B]	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC VI.1	**R 336.1205, R 336.2803, R 336.2804, R 336.2810**
8. GHGs as CO_2e	95,360 tpy[2,B]	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC VI.1	**R 336.1205, R 336.2810**

[A] This includes PM10/PM2.5 from all natural gas combustion at the Michigan Assembly Complex and all coating operations including EU-COAT scuff booth, EU-GUIDECOAT spray and scuff booths, EU-TOPCOAT spray and scuff booths, and EU-MISCOAT Black Out and Cavity Wax and Final Repair. It does not include the Powerhouse (EU-BOILER#1, EU-BOILER#2, and EU-BOILER#3) or the emergency engines.

[B] This includes the emissions of this pollutant from all natural gas combustion at the Michigan Assembly Complex. It does not include the Powerhouse or the emergency engines.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Natural gas	1.63 Billion cubic feet per year[2]	12-month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC VI.1	**R 336.1205, R 336.2803, R 336.2804, R 336.2810**

* This includes total natural gas combustion for all operations at the Michigan Assembly Complex. It does not include the Powerhouse.

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each spray coating booth and scuff booth operation with one of the following: water wash particulate controls, dry filter particulate controls, or equivalent particulate control technology.[2] **(R 336.1301, R 336.1331, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall verify PM10 and PM2.5 emission rates from representative particulate emission units or portions of emission units as identified in a complete test plan by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM10 / PM2.5	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1301, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c) & (d))**

2. The permittee shall verify NOx, and CO emission rates from a representative phosphate boiler and a representative regenerative thermal oxidizer (RTO) portion of FG-FACILITY by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
NO_x	40 CFR Part 60, Appendix A
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. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60

days following the last date of the test. **(R 336.1301, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(c) & (d))**

3. The permittee shall verify the PM10 and PM2.5 emission rates from representative particulate emission units or portions of emission units as identified in a complete test plan by testing at owner's expense, at a minimum, every five years from the date of the last test, unless the permittee maintains a yearly demonstration that the most recent acceptable test remains valid and representative. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

4. The permittee shall verify the NOx, and CO emission rates from a representative phosphate boiler and a representative regenerative thermal oxidizer (RTO) portion of FG-FACILITY by testing at owner's expense, at a minimum, every five years from the date of the last test, unless the permittee maintains a yearly demonstration that the most recent acceptable test remains valid and representative. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep the following records/calculations in a format acceptable to the AQD District Supervisor. The permittee shall compile all required records and complete all required calculations and make them available within 30 days following the end of each calendar month for which records are required to be kept.

   a. For each material used in FG-FACILITY:
      i. Material identification;
      ii. Material VOC content; and,
      iii. Material usage.

   b. The amount of natural gas burned during each calendar month and 12-month rolling time period, in cubic feet.

   c. Number of jobs each calendar month, where a job is defined as a painted vehicle leaving the assembly line.

   d. Calculations showing the FG-FACILITY monthly and annual mass VOC emission rates, in tons per month and tons per 12-month rolling time period, as determined at the end of each calendar month. Calculations must show the capture and control efficiency of each control device used. Calculations must also include a sample calculation based on the production of a single job and that specifies all measured or assumed process parameters (e.g., transfer, capture and control efficiencies, booth splits, etc.) and VOC emissions due to natural gas combustion. Prior to the initial testing, for each controlled section, the design combined capture and control efficiency may be used. Thereafter, values no greater than the most recently tested values may be used.

   e. Calculations showing the VOC emission rate (lb/job) on a 12-month rolling basis, as determined at the end of each calendar month for the equipment covered by FG-FACILITY.

   f. Calculations showing the PM10, PM2.5, NOx, SO_2, and CO mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY. These calculations shall be done according to a method acceptable to the AQD District Supervisor and shall use AP-42 (or other agreed upon emission factors) or emission factors developed from the testing required in SC V.1 and SC V.2.

   g. Calculations showing the GHGs as CO_2e mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY.

   h. Hours of operation for each calendar month and 12-month rolling time period.

   All records/calculations shall be kept on file and made available to the Department upon request.[2]
   (R 336.1225, R 336.1901, R 336.2810, R 336.2908(3))

2. The permittee shall monitor the condition of each particulate control system through weekly visual inspections. The permittee shall keep records of visual inspections of each exhaust filter, or water wash particulate control

system which include the dates and results of the inspections, and the dates and reasons for repairs. All records shall be kept on file and made available to the Department upon request.[2] **(R 336.1301, R 336.1331, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

3. The permittee shall maintain a record of modifications to any add-on control equipment including any testing and monitoring to demonstrate satisfactory operation upon which compliance with any of the emission limits in FG-FACILITY, SC I.1, 2, and 3 depends.[2] **(R 336.1225, R 336.1301, R 336.1331, R 336.1901, R 336.1910, R 336.2803, R 336.2804, R 336.2908(3), 40 CFR 52.21(c) & (d))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. For each emission unit (EU) and flexible group (FG) included in this permit, the permittee shall submit to the AQD District Supervisor, in an acceptable format, within 30 days following the end of the quarter in which the data was collected, the actual VOC, PM10, PM2.5, NOx, CO, SO_2, and GHGs as CO_2e emission rates for each limit included in the permit.[2] **(R 336.1205, R 336.2810, R 336.2908(3))**

5. The permittee shall notify the AQD District Supervisor, in writing, of projects authorized by SC IX.3 and 4 at least 30 days prior to initialization of the activity. The notification shall include, at a minimum, a description of the type of project and any changes in testing, monitoring, recordkeeping or other compliance evaluation activities.[2] **(R 336.1201)**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. This permit covers automotive assembly and painting operations for the Michigan Assembly Plant. Changes to these operations or replacement with a different process type are subject to the requirements of R 336.1201, except as disallowed by R 336.1278 or as allowed by R 336.1279 through R 336.1290 or SC IX.3 or 4.[2] **(R 336.1201)**

2. The Department has determined that compliance with the limits listed in SC I.1 through SC1.8 provides a level of control that is at least equivalent to and not less stringent than the standards in 40 CFR 60.392, *et seq.* and R 336.1610. Accordingly, compliance with the limitations in this permit meets all applicable requirements of 40 CFR Part 60, Subpart MM and R 336.1610.[2] **(R 336.1610, 40 CFR 60, Subpart MM)**

3. This permit authorizes any activities including projects involving physical changes or changes in the method of operation to existing emission units that do not require an increase in the emissions limits or performance levels specified in SC I.1 through SC1.8. As a state only enforceable requirement[1], the changes to the emission unit(s) shall not result in a meaningful change in the nature or quantity of toxic air contaminants emitted from the stationary source. The permittee shall keep on file a demonstration, consistent with AQD Policy and Procedure number AQD-025, or according to the method outlined in SC IX.4. Such activities do not require the facility to obtain any federal or state air permits. [2] **(R 336.1201)**

4. This permit authorizes projects involving the installation of new emission units that do not require an increase in the emissions limits or performance levels specified in SC I.1 through SC1.8 under the following conditions: [2] **(R 336.1201)**
   a. As a state-only enforceable requirement, the new emission unit will not result in an exceedance of any air toxics standards found in Rule 336.1226 or Rule 336.1227. The permittee shall keep on file, a copy of all demonstrations that the air toxics impact from the new emission unit(s) will comply with the levels specified in Rule 336.1226 or Rule 336.1227. The permittee may devise its own method to perform this demonstration subject to approval by the department.[1]
   b. The new emissions unit will not be a newly constructed or reconstructed major source of hazardous air pollutants as defined in and subject to 40 C.F.R. §63.2 and §63.5(b)(3), National Emission Standard for Hazardous Air Pollutants; and,
   c. The installation of the new emissions unit will not cause the violation of any applicable air requirement.
   d. A demonstration that the new installation meets these criteria shall be kept on site for the life of the new emission unit and made available to the department upon request. The permittee must notify the department of the installation of the new emission unit. This notification must contain the information specified in R 336.1215(3)(c)(i) through (v). Construction of the new emission unit may commence upon submittal of the notice.

5. The emission limits and performance levels specified in SC I.1 through SC1.8 may be reviewed and/or adjusted when newly applicable federal requirements or any other requirement that is enforceable as a practical matter and that the Department, under its State Implementation Plan, may impose on the facility become applicable during the term of the permit that would lower allowable emissions. Adjustments to SC I.1 through SC1.8 will be made through a permit revision as of the effective date of the new applicable requirements and will reflect the impact the new applicable requirements will have on the affected emission units. Initial compliance with the adjusted emission limits and performance levels will be demonstrated over the initial compliance period granted by the newly applicable federal requirement.[2] **(R 336.1225, R 336.1901, R 336.2908(3))**

6. The permittee may, at any time, request that the Department terminate the flexible emission limit provisions of this permit and issue a traditional permit. In the event of such termination, the requirements of this permit shall remain in effect until a new permit is issued. At that time, the permit conditions for any existing emission unit that has not been modified and to which new requirements have not become applicable will revert to those found in the previous permits. For any new or modified emission unit, or any emission unit for which new requirements have become applicable the permit conditions will reflect requirements contemporaneous with the date of installation, modification or new requirement applicability.[2] **(R 336.1225, R 336.1901, R 336.2908(3))**

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FG-CONTROLS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Regenerative thermal oxidizers used for control of VOC emissions from the paint spray booths and curing ovens.

Emission Unit: All emission units and flexible groups associated with automotive assembly and painting operations with VOC controls.

POLLUTION CONTROL EQUIPMENT

Regenerative thermal oxidizers used for control of VOC emissions from portions of the painting operations and curing ovens. .

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall develop, maintain and implement an Operation and Maintenance Plan (O & M Plan) for FG-CONTROLS. The O & M Plan shall contain the minimum requirements as outlined in Appendix 2-3. The O & M Plan shall be updated as necessary to reflect changes in equipment and monitoring, to implement corrective actions and to address malfunctions. Changes in the O & M Plan as outlined in Appendix A shall be submitted to the AQD District Supervisor for review and approval. All records and activities associated with the O & M Plan shall be made available to the Department upon request.[2] **(R 336.1901, R 336.1910, R 336.2908(3), 40 CFR 64.6(c)(1)(i)(ii)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall conduct destruction efficiency testing on the applicable FG-Controls emission units by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R336.2001, R336.2003, R336.2004)**

2. The permittee shall conduct capture efficiency testing, and transfer efficiency testing on the applicable FG-Controls emission units by testing at owner's expense, in accordance with Department requirements. However, it is understood that changes at this facility may require a delay in this testing requirement. Should

circumstances arise that would necessitate changes to the testing timeframe, the permittee may request in writing to the District Supervisor for an extension to the testing timeframe. The Department may consider a delay to the testing requirement in the permit and provide for an extension to the testing requirement. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R336.2001, R336.2003, R336.2004)**

3. After the testing required in Special Condition V.1 is completed, the permittee shall conduct capture efficiency testing, destruction efficiency, and transfer efficiency testing every 5 years, unless an acceptable demonstration has been made that the current testing remains valid and representative. The permittee shall verify the capture efficiency, destruction efficiency and the transfer efficiency on the applicable FG-Controls emission units by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R336.2001, R336.2003, R336.2004)**

4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall install, maintain and operate in a satisfactory manner, combustion chamber temperature monitoring devices for the thermal oxidizers in FG-CONTROLS to monitor and record the temperature on a continuous basis during operation. Temperature data recording shall consist of measurements made at equally spaced intervals at least once every 15 minutes. All records shall be kept on file and made available to the Department upon request.[2] **(R 336.1910, R 336.2908(3), 40 CFR 60 Subpart MM, 40 CFR 64.6(c)(1)(i)(ii))**

2.

3. The permittee shall maintain records of maintenance and repair activities. Records shall identify the equipment inspected and the date of the inspection. The permittee shall also record any maintenance activities or corrective actions taken as a result of equipment inspections or due to malfunction. All records shall be kept on file and made available to the Department upon request.[2] **(R 336.1910, 40 CFR 64.6(c)(1)(i)(ii), 40 CFR 64.7(b)(1))**

4. For each control device in operation during production (coating vehicles, booth cleaning if credit is taken, etc.), the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass was open shall be kept on file.[2] **(R 336.1910, 40 CFR 64.3(a)(2))**

5.
6. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**

7. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required

intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there were no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

5. Each semi-annual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii), R336.1213(3))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. For the purposes of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(40 CFR 64.6(c)(2))**
   a. A temperature excursion is defined as a confirmed three-hour period during which the average temperature fails to meet the specified temperature monitoring requirements.
   b. A monitoring excursion is defined as a failure to properly monitor as required by special conditions VI.1, VI.2, VI.3 or VI.6
   c. A monitoring excursion is defined as a failure to properly implement and/or maintain the O&M plan required in special condition III.1

2. The permittee shall comply with all applicable provisions of 40 CFR Part 64. **(40 CFR Part 64)**

3. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM requirements within the O&M Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FG-MACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each new, reconstructed, or existing affected source as defined in 40 CFR 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts, 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) is subject to the requirements of 40 CFR 63 Subpart IIII. This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.

Emission Units: All emission units and flexible groups associated with automotive assembly and painting operations.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.60 lb per GACS[2]	Calendar month	EU-ECOAT, EU-SEALERS, EU-GUIDECOAT, EU-TOPCOAT, EU-MISCCOAT, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations in the Paint Shop.	SC III.3, SC V.1, SC VI.3	**40 CFR 63.3091(a)**
2. Organic HAP	1.10 lbs per GACS*,[2]	Calendar month	EU-GUIDECOAT, EU-TOPCOAT, EU-MISCCOAT, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations in the Paint Shop.	SC III.3, SC V.1, SC VI.3	**40 CFR 63.3091(b)**
3. Organic HAP	0.01 lb per lb of coating[2]	Calendar month	NGB Adhesives and Sealers that are not components of glass bonding systems.	SC III.3, SC V.1, SC VI.3	**40 CFR 63.3090(c) or 63.3091(c)**
4. Organic HAP	0.01 lb per lb of coating[2]	Calendar month	Deadener materials	SC III.3, SC V.1, SC VI.3	**40 CFR 63.3090(d) or 63.3091(d)**

* The permittee may choose to comply with this limit if the criteria in SC I.5 are met.

5. The permittee may choose to comply with either SC I.1 or 2. SC I.2 may be chosen only if EU-ECOAT meets either of the following requirements.[2] **(40 CFR 63.3092)**

   a. Each individual material added to EU-ECOAT contains no more than 1.0 percent by weight of any organic HAP and no more than 0.10 percent by weight of any OSHA-defined carcinogenic organic HAP; or,

b. The emissions from all EU-ECOAT bake ovens are captured and ducted to the oven thermal oxidizer which achieves a minimum destruction efficiency of at least 95 percent (by weight).

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	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 SC I.1 through 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.[2] **(40 CFR 63.3094)**

   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 SC I.1 through 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).

2. 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).[2] **(40 CFR 63.3100(c), 40 CFR 63.4493(b) and (c))**

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

4. For any coating operation(s) for which HAP emission reductions due to the use of add-on control equipment are relied upon to demonstrate compliance with the emission limits in SC I.1 through 4 above, the permittee shall meet the operating limits specified in Table 1 of 40 CFR 63 Subpart IIII as identified below. The operating limits in Table 1 apply to the emission capture and add-on control systems on the coating operations. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3167. The operating limits shall be met at all times after they are established, except for periods of startup, shutdown and malfunction.[2] **(40 CFR 63.3093, 40 CFR 63.3100(b), (d) and Table 1)**

Add-On Control Device:	Operating Limit:
Thermal Oxidizer	The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3167(a).
Concentrators, Including Zeolite Wheels and Rotary Carbon Adsorbers	The average desorption gas inlet temperature in any 3-hour period must not fall below the limit established according to 40 CFR 63.3167(e).

5. The permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) in accordance with 40 CFR 63.6(e)(3). This plan must address the startup, shutdown and corrective actions in the event of a malfunction of any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.[2] **(40 CFR 63.3100(f))**

6. The permittee shall operate and maintain FG-MACT including any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, according to the provisions in 40 CFR 63.6(e)(1)(i).[2] **(40 CFR 63.3100(d))**

7. The permittee shall maintain a log detailing the operation and maintenance of any emission capture system, add-on control device, or continuous parameter monitor upon which compliance with any of the emission limits in SC I.1 through 4 depends. The log shall cover the period between the compliance date specified in 40 CFR 63.3083 and the date when the initial emission capture system and add-on control device performance tests have been completed, as specified in 40 CFR 63.3160.[2] **(40 CFR 63.3100(e))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.3130, 40 CFR 63.3131)**

1. The permittee shall perform the applicable performance tests and compliance demonstrations in accordance with 40 CFR 63.3150-3152, 40 CFR 63.3160-3161, 40 CFR 63.3163-3168, 40 CFR 63.3170-3171, and 40 CFR 63.3173.[2] **(40 CFR Part 63, Subpart IIII)**

2. The permittee may rely upon the results of capture, destruction or transfer efficiency tests that have been previously conducted upon written approval from the AQD District Supervisor. Any such previous tests must meet the criteria identified in 40 CFR 63.3160(c)(1) through (3).[2] **(40 CFR 63.3160)**

3. 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.[2] **(40 CFR 63.7, 40 CFR 63.3151)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.3131)**

1. The permittee shall compile all required records and complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the end of the calendar month following each compliance period unless otherwise specified in any monitoring/recordkeeping condition.[2] **(R 336.1213(3))**

2. 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.[2] **(40 CFR 63.3150, 40 CFR 63.3160, 40 CFR 63.3170, 40 CFR 63.3083(a) and (b))**

3. The permittee shall install, operate and maintain each continuous parametric monitoring system in accordance with the applicable provisions of 40 CFR 63.3168.[2] **(40 CFR 63.3168)**

4. The permittee shall keep all records as required by 40 CFR 63.3130 in the format and timeframes outlined in 40 CFR 63.3131.[2] **(40 CFR 63.3130, 40 CFR 63.3131)**

5. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date:

   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 as specified in 40 CFR 63.3130(a).[2] (**40 CFR 63.3130(a))**

   b. A current copy of information provided by materials suppliers or manufactures, 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.[2] **(40 CFR 63.3130(b))**

   c. Monthly records of the following:

      i. For each coating or thinner used in FG-MACT, the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids.[2] **(40 CFR 63.3130(c))**

      ii. For each deadener material, and NGB Sealers and Adhesives used, the mass used in each month and the mass organic HAP content.[2] **(40 CFR 63.3130(c))**

      iii. Calculations of the organic HAP emission rate for FG-MACT in pounds per gallon of applied coating solids. If permittee chooses to comply with the option identified in SC I.5.a., a record of the weight fraction of each organic HAP in each material added to EU-ECOAT. 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–453/R–08–002 (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.[2] **(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, separately for deadener materials and NGB Sealers and Adhesives.[2] **(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.[2] **(40 CFR 63.3130(d) - (f))**

   d. Any additional records pertaining to deviations; startup, shutdown or malfunctions; emission capture systems; performance testing; capture and control efficiency determinations; transfer efficiency determinations; and work practice plans for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, pursuant to 40 CFR 63.3130(g) through (n).[2] **(40 CFR 63.3130(g) – (n))**

e. Records pertaining to the design and operation of control and monitoring systems for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends must be maintained on-site for the life of the equipment in a location readily available to plant operators and inspectors.[2] **(40 CFR 63.3130(o))**

6. The permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 to Subpart IIII of Part 63 for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, pursuant to 40 CFR 63.3163 and 40 CFR 63.3173 using the method(s) described below:[2] **(40 CFR 63.3163, 40 CFR 63.3173 and Table 1)**

Add-On Control Device	Operating Limit:	Continuous Compliance Demonstration Method
Thermal Oxidizer	The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established According to 40 CFR 63.3167(a).	a. Collect the combustion temperature data according to 40 CFR 63.3168(c); b. Reduce the data to 3-hour block averages; and c. Maintain the 3-hour average combustion temperature at or above temperature limit.
Concentrators, Including Zeolite Wheels and Rotary Carbon Adsorbers	The average deposition gas inlet temperature in any 3-hour period must not fall below the limit established according to 40 CFR 6317(e).	a. Collect the temperature data according to 40 CFR 63.3168(f); b. Reduce the data to 3-hour block averages; and c. Maintain the 3-hour average temperature at or above the temperature limit.

7. The permittee shall monitor or secure the valve or closure mechanism controlling each bypass line for each capture system upon which compliance with any of the emission limits in SC I.1 through 4 depends in a non-bypass mode such that the valve or closure mechanism cannot be opened without creating a record that it was opened. The method used to monitor or secure the valve or closure mechanism must meet one of the following:

   a. Flow control position indicator requirements pursuant to 40 CFR 63.3168(b)(1)(i);

   b. Car-seal or lock-and-key valve closures requirements pursuant to 40 CFR 63.3168(b)(1)(ii);

   c. Valve closure monitoring requirements pursuant to 40 CFR 63.3168(b)(1)(iii);

   d. Automatic shutdown system requirements pursuant to 40 CFR 63.3168(b)(1)(iv).

   If any bypass line is opened, a description of why the line was opened and the length of time it remained open must be included in the semi-annual compliance reports required in SC VII.1.[2] **(40 CFR 63.3168(b))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R336.1213(3)(c)(ii))**

2. 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.[2] **(40 CFR 63.3120(a))**

3. The permittee shall submit applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), as specified in 40 CFR 63.3110.[2] **(40 CFR Part 63, Subparts A and IIII)**

4. For any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, the permittee shall submit all performance test reports for emission capture systems and add-on control devices, and reports of transfer efficiency tests as required by 40 CFR 63.3120(b).[2] **(40 CFR 63.3120(b))**

5. For any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, for which a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSMP report as specified in 40 CFR 63.3120(c).[2] **(40 CFR 63. 3120(c), 40 CFR 63.10(d))**

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	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.[2] **(40 CFR Part 63, Subparts A and IIII)**

FG-CIRICEMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition RICE less than 500 bhp.

Emission Units: EU-ISAFP#1WEST, EU-ISAFP#2EAST, EU-WAPDIESEL, EU-FIREPUMP#1 and EU-FIREPUMP#2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each engine in FG-CIRICEMACT shall be installed, maintained, and operated in a satisfactory manner. A list of recommended work practice standards as specified in 40 CFR 63.6602 and Table 2c, Item 6 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the recommended work practices specified in 40 CFR Part 63 Subpart ZZZZ Table 2c:
   a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2,
   b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63 Subpart ZZZZ Table 2c, Item 6)**

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis must be

performed at the same frequency specified for changing the oil in Table 2c of 40 CFR Part 63 Subpart ZZZZ. **(40 CFR 63.6625(j))**

3. The permittee shall install, maintain and operate each engine in FG-CIRICEMACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6605, 40 CFR 63.6625(e))**
4. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each engine in FG-CIRICEMACT to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**
5. The permittee shall not allow each engine in FG-CIRICEMACT to exceed 100 hours per calendar year for maintenance checks and readiness testing and emergency demand response. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(i))**
6. The permittee may operate each engine in FG-CIRICEMACT up to 50 hours per calendar year for non-emergency situations, but those hours are to be counted towards the 100 hours per calendar year for maintenance and testing and emergency demand response, as allowed in 40 CFR 63.6640(f)(2). **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter on each engine in FG-CIRICEMACT **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. If using the oil analysis program in order to extend the specified oil change requirement in 40 CFR Subpart ZZZZ Table 2c, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. **(40 CFR 63.6625(j))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each engine in FG-CIRICEMACT the permittee shall keep in a satisfactory manner, records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(2), 40 CFR 63.6660)**

2. For each engine in FG-CIRICEMACT the permittee shall keep in a satisfactory manner, records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of

operation. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(5), 40 CFR 63.6660)**

3. For each engine in FG-CIRICEMACT the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with operating limitations in SC III.3. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660)**

4. For each engine in FG-CIRICEMACT the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

5. For each engine in FG-CIRICEMACT the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semi-annual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit to the AQD District Supervisor, a semiannual compliance report, as specified in 40 CFR 63.6650, which contains all deviations during the reporting period from any applicable emission limitation or operating limitation. If there are no deviations from any applicable emission limitations or operating limitations, the report shall contain a statement that there were no deviations during the reporting period. The first report shall cover the period beginning on the applicable compliance date specified in 40 CFR 63.6595 and ending on June 30 (postmarked or delivered by July 31) or December 31 (postmarked or delivered by January 31), whichever date is the first date following the end of the first calendar half after the applicable compliance date. Each subsequent report must cover the semiannual period from January 1 through June 30, or from July 1 through December 31. The subsequent reports must be postmarked or delivered by July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period, except as allowed in 40 CFR 63.6650(b)(5). The compliance report must also contain the following information, as specified in 40 CFR 63.6650(c) and (d):
   a. Company name and address.
   b. Certification of the report by a responsible official.
   c. Date of report and beginning and ending dates of the reporting period.
   d. The number of malfunctions, including a brief description of each event, that occurred during the reporting period and a demonstration that the Malfunction Plan was followed during such events.
   e. The total operating time of the RICE at which the deviation occurred during the reporting period.
   f. The number, duration, and cause of deviations and the corrective action taken.

   A copy of the compliance report shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. **(40 CFR 63.6640(b), 40 CFR 63.6650(b),(c),(d), 40 CFR 63.6660)**

5. Each affected source that has obtained a Title V Renewable Operating Permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. **(40 CFR 63.6650(f))**

6. If you own or operate an emergency stationary RICE with a site rating of more than 100 brake hp that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), you must submit an annual report according to the requirements below and as specified in 40 CFR 63.6650(h):
   a. The report must contain the following information:
      i. Company name and address where the engine is located.
      ii. Date of the report and beginning and ending dates of the reporting period.
      iii. Engine site rating and model year.
      iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
      v. Hours operated for the purposes specified in §63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(2)(ii) and (iii).
      vi. Number of hours the engine is contractually obligated to be available for the purposes specified in §63.6640(f)(2)(ii) and (iii).
      vii. Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.
      viii. If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.
      ix. If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.
   b. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.
   c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §63.13**. (40 CFR 63.6650(h), 40 CFR 63.6660)**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	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 ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FG-SIRICEMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, spark ignition RICE greater than 300 bph and less than 500 bhp.

Emission Units: EUMAPEGEN

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each engine in FG-SIRICEMACT shall be installed, maintained, and operated in a satisfactory manner. A list of recommended work practice standards as specified in 40 CFR 63.6602 and Table 2c, Item 6 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the recommended work practices specified in 40 CFR Part 63 Subpart ZZZZ Table 2c:
   a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2,
   b. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63 Subpart ZZZZ Table 2c, Item 6)**

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c of 40 CFR Part 63 Subpart ZZZZ. **(40 CFR 63.6625(j))**

3. The permittee shall install, maintain and operate each engine in FG-SIRICEMACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6605, 40 CFR 63.6625(e))**

4. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each engine in FG-SIRICEMACT to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**

5. The permittee shall not allow each engine in FG-SIRICEMACT to exceed 100 hours per calendar year for maintenance checks and readiness testing and emergency demand response. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(i))**

6. The permittee may operate each engine in FG-SIRICEMACT up to 50 hours per calendar year for non-emergency situations, but those hours are to be counted towards the 100 hours per calendar year for maintenance and testing and emergency demand response, as allowed in 40 CFR 63.6640(f)(2). **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter on each engine in FG-SIRICEMACT. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. If using the oil analysis program in order to extend the specified oil change requirement in 40 CFR Subpart ZZZZ Table 2c, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. **(40 CFR 63.6625(j))**

See Appendix 5-5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each engine in FG-SIRICEMACT the permittee shall keep in a satisfactory manner, records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(2), 40 CFR 63.6660)**

2. For each engine in FG-SIRICEMACT the permittee shall keep in a satisfactory manner, records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(5), 40 CFR 63.6660)**

3. For each engine in FG-SIRICEMACT the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with operating limitations in SC III.3. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660)**

4. For each engine in FG-SIRICEMACT the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

5. For each engine in FG-SIRICEMACT the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semi-annual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit to the AQD District Supervisor, a semi-annual compliance report, as specified in 40 CFR 63.6650, which contains all deviations during the reporting period from any applicable emission limitation or operating limitation. If there are no deviations from any applicable emission limitations or operating limitations, the report shall contain a statement that there were no deviations during the reporting period. The first report shall cover the period beginning on the applicable compliance date specified in 40 CFR 63.6595 and ending on June 30 (postmarked or delivered by July 31) or December 31 (postmarked or delivered by January 31), whichever date is the first date following the end of the first calendar half after the applicable compliance date. Each subsequent report must cover the semi-annual period from January 1 through June 30, or from July 1 through December 31. The subsequent reports must be postmarked or delivered by July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period, except as allowed in 40 CFR 63.6650(b)(5). The compliance report must also contain the following information, as specified in 40 CFR 63.6650(c) and (d):

   a. Company name and address.

   b. Certification of the report by a responsible official.

   c. Date of report and beginning and ending dates of the reporting period.

   d. The number of malfunctions, including a brief description of each event, that occurred during the reporting period and a demonstration that the Malfunction Plan was followed during such events.

   e. The total operating time of the RICE at which the deviation occurred during the reporting period.

   f. The number, duration, and cause of deviations and the corrective action taken.

A copy of the compliance report shall be kept on file for a period of at least five years (at least two years at the site) and made available to the Department upon request. **(40 CFR 63.6640(b), 40 CFR 63.6650(b),(c),(d), 40 CFR 63.6660)**

5. Each affected source that has obtained a Title V Renewable Operating Permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in Subpart ZZZZ in the semi-annual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. **(40 CFR 63.6650(f))**

6. If you own or operate an emergency stationary RICE with a site rating of more than 100 brake hp that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), you must submit an annual report according to the requirements below and as specified in 40 CFR 63.6650(h):

   a. The report must contain the following information:

      i. Company name and address where the engine is located.

      ii. Date of the report and beginning and ending dates of the reporting period.

      iii. Engine site rating and model year.

      iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.

      v. Hours operated for the purposes specified in §63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(2)(ii) and (iii).

      vi. Number of hours the engine is contractually obligated to be available for the purposes specified in §63.6640(f)(2)(ii) and (iii).

      vii. Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

      viii. If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.

      ix. If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.

   b. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

   c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §63.13**. (40 CFR 63.6650(h), 40 CFR 63.6660)**

See Appendix 8-5

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	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 ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FG-POWERHOUSE
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Three natural gas or landfill fired boilers with maximum capacities of 54.9 MMBTU/hr, 85.4 MMBTU/hr, and 85.4 MMBTU/hr, respectively.

Emission Units: EU-BOILER#1, EU-BOILER#2, EU-BOILER#3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.30 lbs per MMBTU heat input[2]	Hourly	EU-Boiler#1 EU-Boiler#2 EU-Boiler#3	GC 13 SC VI.1	**R336.1205(3)**
2. NOx	70.1 lbs/hr[2]	Hourly	EU-Boiler#1 EU-Boiler#2 EU-Boiler#3	GC 13 SC VI.1	**R336.1205(3)**
3. CO	0.035 lbs per MMBTU heat input[2]	Hourly	EU-Boiler#1 EU-Boiler#2 EU-Boiler#3	GC 13 SC VI.1	**R336.1205(3)**
4.CO	7.91 lbs/hr[2]	Hourly	EU-Boiler#1 EU-Boiler#2 EU-Boiler#3	GC 13 SC VI.1	**R336.1205(3)**
5. SO2	0.04 lbs per MMBTU heat input[2]	Hourly	EU-Boiler#1 EU-Boiler#2 EU-Boiler#3	GC 13 SC VI.1	**R336.1205(3)**
6. SO2	9.1 lbs/hr[2]	Hourly	EU-Boiler#1 EU-Boiler#2 EU-Boiler#3	GC 13 SC VI.1	**R336.1205(3)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Combined heat input of natural gas and landfill gas	226 MMBTU/hr[2]	Hourly	EU-Boiler#1 EU-Boiler#2 EU-Boiler#3	GC 13 SC VI.1	**R336.1205(1)(a)**
2. Combined heat input of natural gas and landfill gas	1,898,400 MMBTU/yr[2]	12-month rolling time period	EU-Boiler#1 EU-Boiler#2 EU-Boiler#3	SC VI.1	**R336.1205(1)(a)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not use any fuel other than natural gas or landfill gas in EU-Boiler#1, EU-Boiler#2 and EU-Boiler#3 portions of FG-POWERHOUSE.[2] **(R336.1205(1)(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep the following records/calculations in a format acceptable to the AQD District Supervisor. The permittee shall compile all required records and complete all required calculations and make them available within 30 days following the end of each calendar month for which records are required to be kept. **(R336.1213(3))**
   a. The hours of operation for each boiler daily.
   b. The fuel usage rate for each boiler daily.
   c. Calculations showing the FG-POWERHOUSE hourly mass NOx, CO, and SO2 emission rates.
   d. Calculations showing the combined heat input of natural gas and landfill gas to EU-Boiler#1, EU-Boiler#2, EU-Boiler#3 on both an hourly and on a 12 month rolling time period.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPWH-002	48[2]	76[2]	**R336.120(3)**
2. SVPWH-012	54[2]	76[2]	**R336.120(3)**
3. SVPWH-027	54[2]	76[2]	**R336.120(3)**

IX. OTHER REQUIREMENT(S)

1. The emissions from FG-POWERHOUSE are subject to Michigan Public Act 451 of 1994, Part 55 Air Pollution Control, Administrative Rule 901. If verified odor complaints attributed to the use of landfill gas are received by the Division, Permittee shall conduct a community odor study to determine the potential source of the odors upon written request of the Division at permittee's expense and using techniques acceptable to the Division. A report of the study shall be submitted to the Division as soon as possible, but within 60 days of completion, unless additional time has been allowed by the Division. Upon determination that corrective action by the permittee is necessary to respond to Rule 901, permittee shall prepare and submit such a plan to the Division.[1] **(R336.1901)**[1]

2. Permittee shall discontinue the use of landfill gas as boiler fuel, if a subsequent landfill gas analysis shows an appreciable increase in concentration of any landfill gas contaminant species, until approval for the use of such gas is given by the Division. A contaminant species is any individual contaminant species except methane, ethane, oxygen, nitrogen, water, hydrogen or carbon dioxide. An appreciable increase is that which would result in violation of any applicable requirement.[2] **(R336.1201(3))**

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FG-BOILERMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Major Source Boiler MACT, Boiler/Process Heater, Existing Gas 1 Fuel Subcategory requirements per 40 CFR Part 63, Subpart DDDDD. These existing boilers or process heaters must comply with subpart no later than January 31, 2016, except as provided in 40 CFR 63.6(i).

Emission Units: EU-BOILER#1, EU-BOILER#2, EU-BOILER#3, EU-PHOSPHATE (2 boilers), and EU-FHBOILER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall conduct the initial tune-up of the EU-BOILER#1, EU-BOILER#2, EU-BOILER#3, and EU-PHOSPHATE (2 boilers) no later than 13 months after the previous tune-up to demonstrate continuous compliance as specified in 40 CFR 63.7540(a)(10)(i) through (a)(10)(vi). Alternatively, If your boiler or process heater has a continuous oxygen trim system that maintains an optimum air to fuel ratio, you may conduct a tune-up of the boiler or process heater every 5 years as specified in paragraphs (a)(10)(i) through (vi) of this section to demonstrate continuous compliance.[2] **(40 CFR 63.7510(e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12))**

2. The permittee shall conduct the initial tune-up of the EU-FHBOILER no later than January 31, 2016, and biennially (no more than 25 months after the previous tune-up) thereafter to demonstrate continuous compliance as specified in 40 CFR 63.7540(a)(10)(i) through (a)(10)(vi). Alternatively, If your boiler or process heater has a continuous oxygen trim system that maintains an optimum air to fuel ratio, you may conduct a tune-up of the boiler or process heater every 5 years as specified in paragraphs (a)(10)(i) through (vi) of this section to demonstrate continuous compliance.[2] **(40 CFR 63.7510(e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12))**

3. The permittee, at all times, must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.[2] **(40 CFR 63.7500(a)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For landfill gas, the permittee must develop a site-specific fuel analysis plan for other gas 1 fuels according to the following procedures and requirements in paragraphs (a) and (b) below:[2] (**40 CFR 63.7521(g))**
   a. If the permittee intends to use an alternative analytical method other than those required by Table 6 to this subpart, you must submit the fuel analysis plan to the Administrator for review and approval no later than 60 days before the date that you intend to conduct the initial compliance demonstration described in §63.7510.
   b. The permittee must include the information contained in paragraphs (g)(2)(i) through (vi) of this section in your fuel analysis plan.
      i. The identification of all gaseous fuel types other than those exempted from fuel specification analysis under (f)(1) through (3) of this section anticipated to be burned in each boiler or process heater.
      ii. For each anticipated fuel type, the identification of whether you or a fuel supplier will be conducting the fuel specification analysis.
      iii. For each anticipated fuel type, a detailed description of the sample location and specific procedures to be used for collecting and preparing the samples if your procedures are different from the sampling methods contained in Table 6 to this subpart. Samples should be collected at a location that most accurately represents the fuel type, where possible, at a point prior to mixing with other dissimilar fuel types. If multiple boilers or process heaters are fueled by a common fuel stream it is permissible to conduct a single gas specification at the common point of gas distribution.
      iv. For each anticipated fuel type, the analytical methods from Table 6 to this subpart, with the expected minimum detection levels, to be used for the measurement of mercury.
      v. If the permittee requests to use an alternative analytical method other than those required by Table 6 to this subpart, you must also include a detailed description of the methods and procedures that you are proposing to use. Methods in Table 6 to this subpart shall be used until the requested alternative is approved.
      vi. If the permittee will be using fuel analysis from a fuel supplier in lieu of site-specific sampling and analysis, the fuel supplier must use the analytical methods required by Table 6 to this subpart. When using a fuel supplier's fuel analysis, the permittee is not required to submit the information in §63.7521(g)(2)(iii).

2. For Landfill Gas, the permittee must obtain a single fuel sample for each fuel type for fuel specification of gaseous fuels.[2] **(40 CFR 63.7521(h))**

3. For Landfill Gas, the permittee must determine the concentration in the fuel of mercury, in units of microgram per cubic meter, dry basis, of each sample for each other gas 1 fuel type according to the procedures in Table 6 to this subpart.[2] **(40 CFR 63.7521(i))**

4. If the initial mercury constituents in the gaseous fuels are measured to be equal to or less than half of the mercury specification as defined in 40 CFR 63.7575, you do not need to conduct further sampling.[2] **(40 CFR 63.7540(c)(1))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee must keep records according to paragraphs (a)(1) and (2) of 40 CFR 63.7555, as listed below.[2] **(40 CFR 63.7555(a))**

a. A copy of each notification and report that you submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**

b. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii). **(40 CFR 63.7555(a)(2))**

2. The permittee must maintain monthly records (or at the frequency required by 40 CFR 63.7540(c), of the calculations and results of the fuel specification for mercury in **Table 6** of 40 CFR Part 63, Subpart DDDDD.[2] **(40 CFR 63.7555(g))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

4. The permittee shall submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii). The notification shall contain the information specified in paragraphs 40 CFR 63.7545(e)(1) and (8) as shown below.[2] **(40 CFR 63.7545(e))**

   a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by you or the EPA through a petition process to be a non-waste under 40 CFR 241.3, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 241.3, and justification for the selection of fuel(s) burned during the compliance demonstration. **(40 CFR 63.7545(e)(1))**

   b. In addition to the information required in 40 CFR 63.9(h)(2), your notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

      i. This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR part 63 subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi). **(40 CFR 63.7545(e)(8)(i))**

      ii. "This facility has had an energy assessment performed according to 40 CFR 63.7530(e)." **(40 CFR 63.7545(e)(8)(ii))**

      iii. Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: "No secondary materials that are solid waste were combusted in any affected unit." **(40 CFR 63.7545(e)(8)(iii))**

5. For units that are subject only to a requirement to conduct a 5 year tune-up according to 63.7542(a)(12), the permittee may submit only a 5-year compliance report, as specified in 40 CFR 63.7550(b)(1) through(4) instead of a semi-annual compliance report.[2] **(40 CFR 63.7550(b)(4), (40 CFR 63.10(a)(5))**

   a. The first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, and ending on July 31 or January 31, whichever date is the first date that occurs at least 5 years, if submitting a 5-year compliance report after the compliance date that is specified for the source in 40 CFR 63.7495. **(40 CFR 63.7550(b)(1))**

b. The first compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495. The first 5-year compliance report must be postmarked or submitted no later than January 31. **(40 CFR 63.7550(b)(2), (40 CFR 63.10(a)(5))**

c. Each subsequent 5 year compliance report must cover the applicable 5 year period from January 1 through December 31. **(40 CFR 63.7550(b)(3))**

d. Each subsequent 5 year compliance report must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(4), (40 CFR 63.10(a)(5))**

6. For units that are subject only to a requirement to conduct a 5-year tune-up according to40 CFR 63.7540(a)(12), the permittee must submit a 5 year compliance report containing the information specified in 40 CFR 63.7550(c)(1).[2] **(40 CFR 63.7550(c)(1))**

7. The permittee must submit the reports according to the procedures specified in paragraphs (h)(1) through (3) of 40 CFR 63.7550, as applicable.[2] **(40 CFR 63.7550(h))**

   a. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) You must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, you may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (*http://www.epa.gov/ttn/chief/cedri/index.html*), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §63.13. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. **(40 CFR 63.7550(h)(3))**

8. If you operate a unit designed to burn natural gas, refinery gas, or other gas 1 fuels that is subject to this subpart, and you intend to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of this part, part 60, 61, or 65, or other gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in §63.7575, you must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in §63.7575. The notification must include the information specified in paragraphs (f)(1) through (5) of this section.[2] **(40 CFR 63.7545(f))**

   a. Company name and address.

   b. Identification of the affected unit.

   c. Reason you are unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared or the natural gas supply interruption began.

   d. Type of alternative fuel that you intend to use.

   e. Dates when the alternative fuel use is expected to begin and end.

9. Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report, according to paragraph (h) of this section, by the date in Table 9 to this subpart and according to the requirements in paragraphs (b)(1) through (4) of this section. For units that are subject only to a requirement to conduct subsequent annual, biennial, or 5-year tune-up according to §63.7540(a)(10), (11), or (12), respectively, and not subject to emission limits or Table 4 operating limits, you may submit only an annual, biennial, or 5-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of this section, instead of a semi-annual compliance report.[2] **(40 CFR 63.7550(b))**

   a. The first semi-annual compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in §63.7495 and ending on June 30 or December 31, whichever date is the first date that occurs at least 180 days after the compliance date that is specified for your source in §63.7495. If submitting an annual, biennial, or 5-year compliance report, the first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in §63.7495 and ending on December 31 within 1, 2, or 5 years, as applicable, after the compliance date that is specified for your source in §63.7495. **(40 CFR 63.7550(b)(1))**

b. The first semi-annual compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for each boiler or process heater in §63.7495. The first annual, biennial, or 5-year compliance report must be postmarked or submitted no later than January 31. **(40 CFR 63.7550(b)(2))**

c. Each subsequent semi-annual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and 5-year compliance reports must cover the applicable 1-, 2-, or 5-year periods from January 1 to December 31. **(40 CFR 63.7550(b)(3))**

d. Each subsequent semi-annual compliance report must be postmarked or submitted no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and 5-year compliance reports must be postmarked or submitted no later than January 31. **(40 CFR 63.7550(b)(4))**

e. For each affected source that is subject to permitting regulations pursuant to part 70 or part 71 of this chapter, and if the permitting authority has established dates for submitting semiannual reports pursuant to 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established in the permit instead of according to the dates in paragraphs (b)(1) through (4) of this section. **(40 CFR 63.7550(b)(5))**

10. A compliance report must contain the following information depending on how the facility chooses to comply with the limits set in this rule.[2] **(40 CFR 63.7550(c))**

a. If the facility is subject to the requirements of a tune up you must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii) of 40 CFR 63.7550(c), (xiv) and (xvii) of this 40 CFR 63.7550(c), and paragraph (c)(5)(iv) of 40 CFR 63.7550(c) for limited-use boiler or process heater. **(40 CFR 63.7550(c)(1))**

b. If you are complying with the fuel analysis you must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii), (vi), (x), (xi), (xiii), (xv), (xvii), (xviii) and paragraph (d) of 40 CFR 63.7550(c). **(40 CFR 63.7550(c)(2))**

i. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**

ii. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**

iii. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**

iv. The total fuel use by each individual boiler or process heater subject to an emission limit within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by the EPA or your basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure. **(40 CFR 63.7550(c)(5)(vi))**

v. A summary of any monthly fuel analyses conducted to demonstrate compliance according to §§63.7521 and 63.7530 for individual boilers or process heaters subject to emission limits, and any fuel specification analyses conducted according to §§63.7521(f) and 63.7530(g). **(40 CFR 63.7550(c)(5)(x))**

vi. If there are no deviations from any emission limits or operating limits in this subpart that apply to you, a statement that there were no deviations from the emission limits or operating limits during the reporting period. **(40 CFR 63.7550(c)(5)(xi))**

vii. If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by you during a malfunction of a boiler, process heater, or associated air pollution control device or CMS to minimize emissions in accordance with §63.7500(a)(3), including actions taken to correct the malfunction. **(40 CFR 63.7550(c)(5)(xiii))**

viii. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual, biennial, or 5-year tune-up according to §63.7540(a)(10), (11), or (12) respectively. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**

ix. (xv) If you plan to demonstrate compliance by emission averaging, certify the emission level achieved or the control technology employed is no less stringent than the level or control technology contained in the notification of compliance status in §63.7545(e)(5)(i). **(40 CFR 63.7550(c)(5)(xv))**

x. (xvii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**

xi. For each instance of startup or shutdown include the information required to be monitored, collected, or recorded according to the requirements of §63.7555(d). **(40 CFR 63.7550(c)(5)(xviii))**

xii. For each deviation from an emission limit or operating limit in this subpart that occurs at an individual boiler or process heater where you are not using a CMS to comply with that emission limit or operating limit, or from the work practice standards for periods if startup and shutdown, the compliance report must additionally contain the information required in paragraphs (d)(1) through (3) of this section. **(40 CFR 63.7550(d))**

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of 40 CFR Subpart DDDDD.[2] **(40 CFR Subpart DDDDD)**

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGCOLDCLEANERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EU-ColdCleaner

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. **(R 336.1213(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**

2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:

   a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(h))**

   b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**

2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

   a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**

b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**

c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**

2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**

   a. A serial number, model number, or other unique identifier for each cold cleaner.

   b. The date the unit was installed, manufactured or that it commenced operation.

   c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).

   d. The applicable Rule 201 exemption.

   e. The Reid vapor pressure of each solvent used.

   f. If applicable, the option chosen to comply with Rule 707(2).

3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**

4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FG-RULE 287(c)
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c) including an ink marking of parts emission unit.

Emission Unit: EU-MARKINGINK

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 gallons	Per month, as applied, minus water, per emission unit	NA	**R 336.1287(c)(i)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Any exhaust system that serves only coating spray equipment shall be equipped with a properly installed and operating particulate control system. (R 336.1287(c)(ii))

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 287(c), Permit to Install Exemption Record form (EQP 3562) or an alternative format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**

   a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(c)(iii))**
   b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. **(R 336.1213(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

Emission Unit: EU-Rule 290

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**

2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**

   a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**

   b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**

   c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**

   d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**

3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**

   a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than

or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**

b. The visible emissions from the emission unit are not more than 5 percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**
c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**

   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**

   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**

   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**

   d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**

   e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**

   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**

   b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate**. (R 336.1213(3))**

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating

conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1: Abbreviations and Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
EGLE	Michigan Department of Environment, Great Lakes, and Energy	NO_x	Oxides of Nitrogen
		ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10 microns in diameter
NAAQS	National Ambient Air Quality Standards		
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
		µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. **(R 336.1213(4)(a), R 336.1119(a)(ii))**

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Elements of an O & M Plan

General – Keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for each respective add-on control device used to demonstrate compliance with applicable VOC emissions limits.

Thermal Oxidizers

1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
2. Perform a heat exchanger visual internal inspection a minimum of once every 18 months.*

Regenerative Thermal Oxidizers

1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
2. Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months.*
3. Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months.*

Rotary Carbon Concentrator

1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
2. Perform internal observation of adsorbent materials for contamination and erosion a minimum of once every 18 months.*
3. Observe and record the pressure drop across the concentrator a minimum of once every calendar quarter.

Fluidized Bed Concentrator

1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
2. Perform internal observation of adsorbent materials for contamination and erosion a minimum of once every 18 months.*
3. Maintain records of carbon bead cleaning and replacement.

* The requirement to address this issue is satisfied if a performance test (i.e., stack test) has been performed on the control device within the prior 18 month period.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-A8650-2010. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-A8650-2010 is being reissued as Source-Wide PTI No. MI-PTI-A8650-2016.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
139-15	NA	Consolidate natural gas usage limitations	FG-WAYNEFACILITY

The following table lists the ROP amendments or modifications issued after the effective date of ROP No. MI-ROP-A8650-2016.

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
192-17	202000083 / July 28, 2020	To incorporate PTI 192-17 into the ROP, which is for a flexible emission limits for SO2, CO, NOx, PM10, PM2.5, and CO2e in FG-FACILITY. The changes also include a new limit on the amount of natural gas that can be used on an annual basis. There are no planned physical changes or changes in the method of operations at the facility. FG-WAYNEFACILITY was removed from the ROP, since it was incorporated into the Flexible Group FG-FACILITY. It should be noted that FG-FACILITY is where the new flexible permit emission limits are located. This flexible group has a different description than how "FGFACILITY" or "Source-Wide" is defined in most other permits. The description identifies specific parts of the auto plant that are part of the flexible group, namely: equipment used for automotive stamping, assembly, and painting operations for the entire Michigan Assembly Complex. This flexible group does not include the powerhouse, which is covered in a separate part of the ROP.	EU-PHOSPHATE EU-ECOAT EU-SEALERS EU-GUIDECOAT EU-TOPCOAT EU-MISCCOAT EU-PURGE&CLEAN EU-FLUIDFILL EU-GASOLINETANKS EU-BOILER#1 EU-BOILER#2 EU-BOILER#3 FG-FACILITY FG-CONTROLS FG-MACT FG-BOILERMACT

Appendix 7. Emission Calculations

The permittee shall use the calculations and methodologies in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in US EPA Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Trucks (September 2008, EPA-453/R-08-002)for EU-Guidecoat and EU-Topcoat.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the EGLE Report Certification form (EQP 5736) and EGLE Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

Surface Coating: Automobile and Light-Duty Truck MACT Standard
Organic HAP Work Practices Plan
Michigan Assembly Plant
Ford Motor Company

The Automobile and Light-Duty Truck Surface Coating Maximum Achievable Control Technology Standard (40 CFR 63.3094), "Auto MACT", requires the development and implementation of a work practice plan. This work practice plan identifies those actions required to minimize Hazardous Air Pollutant (HAP) emissions from the storage, mixing, and conveying of coatings, thinners, cleaning materials, and waste materials used by or generated by the coating operations within the paint shop at the plant. Specifically, the plan addresses coatings and thinners, cleaning materials, and waste materials listed below.

In general, all organic HAP containing coatings, thinners, cleaning materials, and waste materials are stored in closed containers until used. Additionally, all such materials are transported in either closed containers or through piping to the point of use or disposal to minimize the risk of spills from such materials. Places where such materials are transferred from storage containers to points of use are contained and operated by trained personnel to ensure that such materials are not spilled and, in case of such a spill, are contained and cleaned up immediately.

This work practice plan has been integrated into the plant's Environmental Management System. This system includes periodic inspections to ensure compliance with this work practice. Periodic training is conducted to ensure that affected employees are aware of these standard operating practices. When necessary, deviations from these work practices will be reported in the plant's Renewable Operating Permit deviation report as required by the Auto MACT Standard.

GENERAL HANDLING AND HOUSEKEEPING REQUIREMENTS

In general, all coatings, solvents, and cleaning materials associated with coating operations including general housekeeping in the areas where these coating operations are housed are managed using the techniques listed below in order to minimize HAP emissions:

(A) Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
(B) Storing new and used solvents in closed containers.
(C) Transferring of solvents in a manner to minimize the risk of spills through the use of closed containers during transfer or through piping to the point of use or disposal.
(D) Mixing tanks or vessels, other than day tanks equipped with continuous agitation systems, are kept closed when adding, removing, or mixing the contents.

WIPE SOLVENTS

Wipe solvents are managed through one or more of the techniques listed below in order to minimize HAP emissions:

(A) Use of solvent-moistened wipes.
(B) Keeping solvent containers closed when not in use.
(C) Keeping wipe disposal/recovery containers closed when not in use.
(D) Use of tack-wipes.

PURGE SOLVENTS

Purge solvents are managed through one or more of the techniques listed below in order to minimize HAP emissions:

(A) Air/solvent push-out of coatings and solvent (excluding applicator nozzles and tips).
(B) Capture and reclaim or recovery of purge materials (excluding applicator nozzles and tips).
(C) Block painting to the maximum extent feasible.

LINE CLEANING (FLUSH) SOLVENTS

Line cleaning (flush) solvents are managed through one or more of the techniques listed below in order to minimize HAP emissions:

(A) Keeping solvent containers closed when not in use.
(B) Recovering and recycling solvents.
(C) Keeping recovered/recycled solvent containers closed when not in use.

BOOTH GRATE CLEANING

Booth grate cleaning is performed using one or more of the techniques listed below in order to minimize HAP emissions:

(A) Rinsing with high-pressure water (in place).

BOOTH WALL CLEANING

Spray booth walls cleaning is performed using one or more of the techniques listed below in order to minimize HAP emissions:

(A) Use of spray-on masking.
(B) Controlled access to cleaning solvents (lock-out, etc.).

BOOTH EQUIPMENT CLEANING

Cleaning of spray booth equipment in the paint booths is performed using one of more of the techniques listed below in order to minimize HAP emissions:

(A) Use of covers on equipment (disposable or reusable).
(B) Use of parts cleaners (off-line submersion cleaning).
(C) Controlled access to cleaning solvents.

EXTERNAL BOOTH CLEANING

Cleaning of external spray booth areas in the Paint Shop is performed using one or more of the techniques listed below:

(A) Use of removable floor coverings (paper, foil, plastic, or similar type of material).
(B) Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application.
(C) Use of booties or shoe wraps.
(D) Controlled access to cleaning solvents.

GENERAL HOUSEKEEPING

The plan must address emissions from housekeeping measures not addressed in the above specific areas through one or more of the techniques listed below.

(A) Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
(B) Storing new and used solvents in closed containers.
(C) Transferring of solvents in a manner to minimize the risk of spills.

Michigan Assembly Plant

Title V Renewable Operating Permit
MI-ROP-A8650-2016a

Operating and Maintenance Plan
For Flexible Group - FGCONTROLS

Modified October 2020

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DESCRIPTION OF CONTROL EQUIPMENT

A typical paint booth emission control systems consists of two steps: filtration and destruction. Filtration is achieved through the used of dry filters in a Filter House or Wet Electrostatic Precipitators (WEPS). The air stream is then routed to a Regenerative Thermal Oxidizer for destruction. Emissions from paint oven operations are routed directly to a Regenerative Thermal Oxidizer for destruction.

PREVENTATIVE MAINTENANCE PROGRAM

Identification of Supervisory Personnel

The Paint Area Manager and Paint Manufacturing Engineering Manager are responsible for overseeing the inspection, maintenance and repair of emission control devices at the Michigan Assembly Plant.

Description of Items and/or Conditions that Shall Be Inspected/Frequency of Inspection or Maintenance

Recommended equipment inspections are performed on a routine basis. Specific inspection and maintenance tasks are incorporated into the facility's electronic Total Equipment Maintenance System (TEMS) that stores inspection and maintenance task information automatically generates work orders and tracks completion dates. The table below lists the minimum preventive maintenance activities performed to assure optimum operating performance of the emission controls systems at the Michigan Assembly Plant. All records of maintenance inspections including the dates, inspection results and dates and reasons for repairs, if made, are located at the Paint Shop and maintained for five years. Preventive maintenance tasks are subject to change based on best engineering judgment and technological/equipment improvements.

Control Device	Frequency	TEMS PM Number	Preventative Maintenance TEMS Task Title/Description of Maintenance Activity
Regenerative Thermal Oxidizer	Annually	PNX04365 PNX04249	Combustion Chamber Temperature Calibration Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
Regenerative Thermal Oxidizer	Annually	PNX04272 PNX04373 PNX04343 PNX04234	Cold Face Check / Heat Exchange-Heat Transfer Media Inspection Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months. [1]
Regenerative Thermal Oxidizer	Annually	PNX04285 PNX04386 PNX04357 PNX04245	Inlet/Outlet Valve Check /Valve Seals Condition Inspection Perform an inspection of the valve seals condition a minimum of once every 18 months.[1]

[1] *The requirement to address this issue is satisfied if a performance test (i.e., stack test) has been performed on the control device within the prior 18 month period.*

Identification of Major Replacement Parts to be Maintained in Inventory for Quick Replacement

The emission control devices are equipped with Programmable Logic Controllers to identify conditions that may contribute to malfunctions by generating warning faults and alarms. Typically, only small minor repairs are required (i.e., replacement of proximity switches). However, each facility maintains a list of recommended major replacement parts in the TEM system and routinely verifies part availability (i.e., quarterly). The following is a list of the spare parts maintained at the Michigan Assembly Plant.

TYPICAL EMISSION CONTROL EQUIPMENT REPLACEMENT PARTS INVENTORY

Part Name	Storage Location
SLA VFD	General Stores
Thermocouples, Honeywell	General Stores

Motors for Blowers	General Stores
Variable Frequency Drive Components	General Stores
Honeywell Flame Detection Components	General Stores
PLC Processors, Allen Bradley	General Stores
Gas Train regulators/switches/valves	General Stores
Gas Firing Controllers	General Stores
Hydraulic Cylinders and Valves	General Stores
Filters	General Stores
Pneumatic Cylinders	General Stores

CONTROLLED EMISSION SOURCES

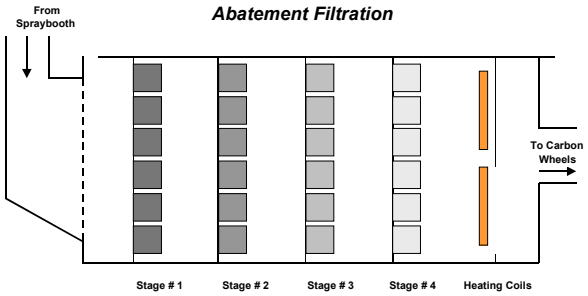
One Regenerative Thermal Oxidizer for control of VOC emissions from the EU-ECOAT dip tank and oven. One regenerative thermal oxidizer for control of VOC emissions from the EU-GUIDECOAT oven and EU-TOPCOAT curing ovens. One regenerative thermal oxidizer to control VOC emissions from EU-GUIDECOAT oven and EU-TOPCOAT booth automatic sections. One regenerative thermal oxidizer to control VOC emissions from EU-TOPCOAT booth automatic sections.

Emission Units: All emission units and flexible groups associated with automotive painting.

EMISSION CONTROL EQUIPMENT

Filter House – Abatement Filtration

As the solvent laden air passes through four different stages of filtration, smaller and smaller particulate sizes are removed before being directed to the Rotary or Fluidized Bed Concentrator. Differential pressure gauges are located between filtration stages and are monitored to determine the frequency of filter changes. Typical ranges for differential pressures stages are <1.0 inches water column for Stage 1, <1.25 inches water column for Stage 2, <1.25 inches water column for Stage 3 and <1.5 inches water column for Stage 4. Depending on the type and age of the equipment, the Programmable Logic Controller (PLC) may be programmed to sound an alarm if the differential pressure is outside an acceptable safety margin value. The facility may also inspect and trend the differential pressures on a routine basis to schedule the next required filter change.



Regenerative Thermal Oxidizer (RTO)

The Regenerative Thermal Oxidizer consists of multiple towers installed in a line, each containing a packed bed of inert ceramic based media. Ford RTOs typically consist of three towers that continuously alternate from inlet, outlet and purge stages. Incoming solvent-laden exhaust from the Filter House System flows into the bottom of the first tower and up through the hot ceramic saddles or ceramic block. Air is preheated to within 60-100^{o}F of the combustion temperature of approximately 1400^{o}F. The clean hot exhaust gas then flows down through the second ceramic filled tower and transmits most of its thermal energy to the ceramic media before being discharged. After 1-2 minutes the dampers change positions and the air flow is reversed. Solvent laden air flows through the second tower that was preheated. The combustion chamber temperature is monitored through the Programmable Logic Controller. Depending on the type and age of the equipment, the Programmable Logic Controller (PLC) may be programmed to sound an alarm if the combustion chamber temperature is outside an acceptable safety margin value.

CORRECTIVE PROCEDURES

Description of the Corrective Procedures Taken in the Event of a Malfunction or Failure

When an abatement equipment fault condition/fault status occurs for more than 15 minutes, the facility Plant Environmental Control Engineer (PECE), Paint ME Manager and Paint Maintenance Superintendent are contacted. The notification includes the piece of abatement equipment the fault occurred on and the time the fault occurred. If the abatement equipment fault condition/fault status continues for more than 2 hours, a follow-up notification will be sent stating the current status of the incident and information on the cause of the fault. If the PECE cannot be immediately reached by telephone or radio, a text page message is sent. If the PECE does not respond to the text page within 15 minutes, the Paint Area Manager or the Environmental Management Representative (EMR) is contacted.

Once the abatement equipment is back on-line, an Air Emission Control Equipment Breakdown Report is completed with details on the piece of abatement equipment the fault occurred on, the duration of the breakdown (i.e., date, times, shift type), interim corrective actions, root cause of the fault, names and times that any service representatives were contacted and permanent corrective actions. The completed report is submitted to the PECE. The information is also routed to the Environmental Quality Office for review and analysis.

The information on the Air Emission Control Equipment Breakdown Report will be used to adjust emission calculations to account for the breakdown. The PECE will notify the MDEQ Air Quality Division in accordance with Rule 912. The notification is made as soon as reasonably possible. The downtime will be included in the 6 month report.

COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS

The requirements of Compliance Assurance Monitoring (CAM), as promulgated under 40 CFR 64.2, apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

> (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 CFR 64.2(b)(1) of this section;
> (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
> (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, ``potential pre-control device emissions'' shall have the same meaning as ``potential to emit,'' as defined in Sec. 64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

In accordance with 40 CFR 64.3, to provide a reasonable assurance of compliance with emission limitations or standards for the anticipated range of operations at a pollutant-specific emissions unit, monitoring under this part, the CAM Plan shall meet the following general criteria:

> (1) The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance for the control device and any associated capture system. Indicators of performance may include, but are not limited to, direct or predicted emissions, process and control device parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities conducted by the owner or operator.
> (2) The owner or operator shall establish an appropriate range(s) or designated condition(s) for the selected indicator(s) such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions. In addition, unless specifically stated otherwise by an applicable requirement, the owner or operator shall monitor indicators to detect any bypass of the control device (or capture system) to the atmosphere, if such bypass can occur based on the design of the pollutant-specific emissions unit.
> (3) The design of indicator ranges or designated conditions may be based on a single maximum or minimum value if appropriate, may be expressed as a function of process variables, may be expressed as maintaining the applicable parameter in a particular operational status or designated condition, or may be established as interdependent between more than one indicator.

Under 40 CFR 64.4(4)(b), for a CAM Plan, the owner or operator shall submit a justification for the proposed elements of the monitoring plan and if the proposed performance specifications include differences from manufacturer recommendations, the plan shall explain the reasons for the differences. If the CAM Plan relies on presumptively acceptable monitoring, no further justification for the appropriateness of that monitoring should be necessary.

At the Michigan Assembly Plant, the following sources are subject to CAM under the above requirements:

- EU-ECOAT (utilizing regenerative thermal oxidizer for compliance)
- EU-GUIDECOAT (utilizing regenerative thermal oxidizer for compliance)
- EU-TOPCOAT (utilizing regenerative thermal oxidizer for compliance)

In conjunction with this O&M Plan, the following control device parameters and associated inspection and maintenance activities serve as presumptively acceptable monitoring based on known performance of thermal oxidizers for the emission units subject to CAM at the Michigan Assembly Plant:

Regenerative Thermal Oxidizers
Combustion Chamber Temperature and Calibration: Monitor combustion chamber temperature to ensure it is not more than 50 degrees Fahrenheit below the most recent performance test and calibrate or replace the thermocouple a minimum of once every 12 months to ensure air stream is maintained at a temperature necessary to destroy the volatile organic compound within the regenerative thermal oxidizer.
Cold Face Check / Heat Exchange-Heat Transfer Media Inspection: Perform a heat exchange/heat transfer media a minimum of once every 18 months to ensure that solvent-concentrated air may pass into the oxidizer as designed (unless tested within the prior 18 months).
Inlet/Outlet Valve Check /Valve Seals Condition Inspection: Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months to ensure that the proper retention time for destruction of volatile organic compounds within the oxidizer is maintained (unless tested within the prior 18 months).

Monitoring of these key operational parameters described in this section meet the requirements of CAM as defined in 40 CFR Part 64 for each of the affected emission units.

OPERATING AND MAINTENANCE PLAN REVIEWS

This Operating and Maintenance Plan will be reviewed and updated as required to ensure emission control devices are operated in a manner consistent with good air pollution control practices for minimizing emissions. Preventive maintenance tasks and actions taken to respond to malfunctions/faults will be periodically reviewed and changed (if necessary) based on best engineering judgment and technological/equipment improvements.

Reviews of this Operating and Maintenance Plan will be periodically conducted by the PECE and the Paint ME Manager or his designee. Reviews will be completed at least.

Records of the Operating and Maintenance Plan review will be maintained by the PECE for a period of 5 years.

EGLE

RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
A8650	3711	336112	MI-ROP-A8650-2016a	

Source Name: Ford Motor Company, Michigan Assembly Plant

Street Address: 38303 Michigan Avenue

City	State	ZIP Code	County
Wayne	MI	48184	Wayne

Section/Town/Range (if address not available):

Source Description: Automobile and Light-Duty Truck Manufacturing

☐ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
Ford Motor Company	

Mailing address (☐ check if same as source address): One American Road

City	State	ZIP Code	County	Country
Dearborn	MI	48126	Wayne	USA

☐ Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

SRN: A8650	Section Number (if applicable):

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name			Title	
John Nowak			Plant Environmental Control Engineer	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
734-467-0902		jnowak2@ford.com		

Contact 2 Name (optional)			Title	
Robert Streight			Air Policy Manager	
Company Name & Mailing address (☐ check if same as source address)				
290 Town Center Drive, Suite 800				
City	State	ZIP Code	County	Country
Dearborn	MI	48126	Wayne	USA
Phone number		E-mail address		
313-845-8364		rstreigh@ford.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name			Title	
Erik Williams			Site Manager	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
734-467-0225		Ewilli31@ford.com		

Responsible Official 2 Name (optional)			Title	
Company Name & Mailing address (☐ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

☐ Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

SRN: A8650	Section Number (if applicable):

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.	
☒ Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	☐ Compliance Plan/Schedule of Compliance
☒ Mark-up copy of existing ROP using official version from the AQD website (required)	☐ Stack information
☐ Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	☐ Acid Rain Permit Initial/Renewal Application
☐ Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	☐ Cross-State Air Pollution Rule (CSAPR) Information
☐ MAERS Forms (to report emissions not previously submitted)	☐ Confidential Information
☐ Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	☒ Paper copy of all documentation provided (required)
☒ Compliance Assurance Monitoring (CAM) Plan	☒ Electronic documents provided (optional)
☒ Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	☐ Other, explain:

Compliance Statement	
This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	☒ Yes ☐ No
The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.	
If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.	

Name and Title of the Responsible Official (Print or Type)

Erik Williams, Site Manager

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

Signature of Responsible Official	**Date**
	1-25-22

SRN: A8650	Section Number (if applicable):

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☒ Yes ☐ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68)	☐ Yes ☒ No
	If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☐ Yes ☒ No
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☐ Yes ☒ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form.	☐ Yes ☒ No
	Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy.	☒ Yes ☐ No
	Is a CAM plan included with this application?	☒ Yes ☐ No
	If a CAM Plan is included, check the type of proposed monitoring included in the Plan:	
	1. Monitoring proposed by the source based on performance of the control device, or	☒
	2. Presumptively Acceptable Monitoring, if eligible	☒
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☒ Yes ☐ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☐ Yes ☒ No
☒	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-**PARTC	

SRN: A8650	Section Number (if applicable):

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☒ Yes ☐ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]
EU291-SEALERS	Sealer used for vehicle components not used in Michigan Assembly Plant products.	Rule 212(4)(1)	Rule 291
EUMAPEGEN	2004 131.6 HP Natural Gas-Fired Emergency Generator (East Side of Final for Security)	Rule 212(4)(c)	Rule 282(2)(g)

Comments:

☐ Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: **AI-**

SRN: A8650	Section Number (if applicable):

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☒ Yes ☐ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No

Comments:
Changes due to consolidation of emission control equipment under FG-CONTROLS that covers EU-GUIDECOAT and EU-TOPCOAT that removed all concentrators and directs all emissions to regenerative thermal oxidizers (RTOs). Change made in accordance with FG-FACILITY, IX. OTHER REQUIREMENTS, 3. A notification describing the change was submitted to EGLE on November 4, 2019.

Other change is to add RICE MACT requirements for the natural gas-fired emergency generator that was activated at the facility. The generator engine was manufactured in September 2004. This unit was in storage until January 2018.

☐ Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: **AI-**

SRN: A8650	Section Number (if applicable):

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to **all** emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. If No, go to Part G. ☒ Yes ☐ No

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed
102-21	EU-GUIDECOAT EU-TOPCOAT FG-CONTROLS	Changes to abatement eliminating concentrators and directing all emissions from EU-GUIDECOAT and EU-TOPCOAT to thermal oxidizers.	12/03/2021

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. ☒ Yes ☐ No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. ☐ Yes ☒ No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identity the stack(s) that were not reported on the applicable MAERS form(s). ☐ Yes ☒ No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. ☐ Yes ☒ No

Comments:
Inclusion of PTI 102-21 into ROP. Permit mark-up reflects new PTI.

☐ Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**

SRN: A8650	Section Number (if applicable):

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.

If Yes, identify the emission units in the table below. If No, go to Part H. ☐ Yes ☒ No

Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	**Emission Unit Description – *Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices***	**Date Emission Unit was Installed/ Modified/ Reconstructed**
☐ Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
☐ Rule 287(2)(c) surface coating line		
☐ Rule 290 process with limited emissions		

Comments:

A Rule 291 Source for the assembly of small parts for products assembled outside of the Michigan Assembly Plant is in place at the site. Rule 291 documentation for this emission unit is maintained at the site. This emission unit is identified in MAERS as EU-291-SEALERS.

☐ Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: **AI-**

SRN: A8650	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If Yes, answer the questions below.	☒ Yes ☐ No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If Yes, describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	☒ Yes ☐ No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If Yes, identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	☒ Yes ☐ No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If Yes, on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify each state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	☒ Yes ☐ No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If Yes, list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	☐ Yes ☒ No
H6. Does the source propose to add, change and/or delete **source-wide** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H7. Are you proposing to **streamline** any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	☐ Yes ☒ No

SRN: A8650	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of concentrators made under provisions of flexible permit provisions resulting in increased control efficiency in accordance with current permit requirements.

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of temperature monitoring requirements associated with the removal of concentrators described above.

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

SRN: A8650	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of stacks associated with concentrator removal described above.

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Addition of Spark Ignition RICE MACT requirements for a natural gas-fired emergency generator.

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

☒ Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI**-PARTH

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: A8650	Section Number (if applicable):

1. Additional Information ID
AI-PARTC

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

The combined Operation and Maintenance Plan (O&M Plan) and Compliance Assurance Monitoring (CAM) Plan will be updated to reflect the latest formatting requirements specified by EGLE following finalization of the MAP/CAM Plan associated with Ford's Dearborn Truck Plant as part of the Ford-Rouge (A8648) Title V permit renewal.

Rather than update the Michigan Assembly Plant plans repeatedly, Ford proposes to wait and adopt the final format and requirements specified by EGLE in the Dearborn Truck Plant plan. This will minimize update and review efforts and ensure consistency between all Ford CAM plans.

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: A8650	Section Number (if applicable):

1. Additional Information ID
AI-PARTH

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

MAP previously had two 3-Wet spray booths associated with EU-GUIDECOAT and EU-TOPCOAT – Enamel #1 (E1) and Enamel #2 (E2). Enamel 1 has one basecoat (BC) and one clearcoat (CC) automation zone that are abated through two carbon concentrators (KCRs) prior to VOC destruction in a regenerative thermal oxidizer (RTO). Enamel 2 had the exhaust from the BC automation zone, Prime (Guidecoat) robot zone, and CC automation zone being discharged to four KCRs and an RTO.

Ford transitioned all abated booth automation zones into recirculated zones. This allows a 90% reduction in the volume of booth exhaust air requiring abatement. All EU-GUIDECOAT and EU-TOPCOAT spray zones previously controlled as well as one additional EU-GUIDECOAT Prime (Guidecoat) spray zone are now controlled. As such, VOC booth capture efficiency is expected to increase from previous levels and overall control efficiency is expected to increase with the removal of the carbon concentrator.

The bleed-air from all RFHs is routed directly to the two presently-operating booth RTOs for E1 and E2 by-passing and eliminating the existing KCRs. These two RTOs destroy the VOCs directly without the 5% to 10% VOC loss typically associated with the use of KCRs resulting in an increased abatement control factor for both the EU-GUIDECOAT and EU-TOPCOAT operations from previous levels.

The four concentrators, presently operating for E2, and the two concentrators supporting E1 will be decommissioned. This eliminates six KCRs from the present operation and prevents the reactivation of an additional three KCRs to support the expansion of booth abatement air volumes.

This project was performed in accordance with Special Condition 3 of FG-FACILITY IX on Permit 192-17. The process changes do not require an increase in the emission limits or performance levels specified in PTI 192-17 nor will the projects result in a reconstructed major source of hazardous air pollutants as defined in and subject to 40 C.F.R. §63.2 and §63.5(b)(3), National Emission Standard for Hazardous Air Pollutants.

No changes to existing testing, monitoring, record-keeping requirements or other compliance evaluation activities are required. The air toxics dispersion modeling will be updated as well as testing to verify the control system capture efficiency and RTO destruction efficiency following completion of the projects. In accordance with Special Conditions 3 and 4 of FG-FACILITY IX., Ford will maintain an updated demonstration that the air toxics impact from the changed emission units will continue to comply with the levels specified in Rule 336.1226 or Rule 336.1227.

The permit mark-up reflects the removal of the KCRs from the operation but retains all of the applicable monitoring and recordkeeping associated with the RTOs.