

**From:** [Grates, Dawn](#)  
**To:** [EGLE-ROP](#)  
**Cc:** [KuiECK, Sue](#)  
**Subject:** E5094 – ROP Renewal Application, Hutchinson Antivibration Systems, Inc., Grand Rapids, MI (221125)  
**Date:** Tuesday, March 14, 2023 10:27:50 AM  
**Attachments:** [ROP Renew App\\_HAVS GR\\_2023\\_0302\\_FNL.pdf](#)  
[03\\_Redline\\_E5094\\_Final\\_10-21-18.docx](#)

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Renewable Operating Permit (ROP) Renewal Application  
MI-ROP-E5094-2018  
Hutchinson Antivibration Systems, Inc. (SRN E5094)  
Grand Rapids, Michigan  
Project No. 221125

This message has been sent on behalf of Sue KuiECK, of Fishbeck.

The referenced ROP Renewal Application is attached for your review and approval. For your convenience, a Word version of the ROP Mark-up has been included.  
A hard copy of the Application will follow via UPS.

If you have questions or require additional information, please contact Sue at 616.464.3721 or [slkuiECK@fishbeck.com](mailto:slkuiECK@fishbeck.com).

**Dawn Grates | Administrative Assistant**  
Fishbeck | w: 248.324.2119 | [fishbeck.com](http://fishbeck.com)



## 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 E5094	SIC Code 3714	NAICS Code 336390	Existing ROP Number MI-ROP-E5094-2018	Section Number (if applicable)
Source Name Hutchinson Antivibration Systems, Inc.				
Street Address 460 Fuller Avenue, NE				
City Grand Rapids		State MI	ZIP Code 49503	County Kent
Section/Town/Range (if address not available)				
Source Description Manufacturer of rubber molded automotive parts.				
<input type="checkbox"/> 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 Hutchinson Antivibration Systems, Inc.				Section Number (if applicable)	
Mailing address ( <input checked="" type="checkbox"/> check if same as source address)					
City		State	ZIP Code	County	Country

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

**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 Kaitlyn Laug		Title HSE Coordinator		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 616.233.8266		E-mail address Kaitlyn.Laug@hutchinson.com		

Contact 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

**RESPONSIBLE OFFICIAL INFORMATION**

Responsible Official 1 Name Mark Perry		Title Plant Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 616.233.8258		E-mail address Mark.Perry@hutchinson.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:
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**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.**

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

Mark Perry, Plant 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

3-9-2023

Date

**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 <b>all</b> 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 <b>not</b> been reported in MAERS for the most recent emissions reporting year? If <b>Yes</b> , 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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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) If <b>Yes</b> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C4.	Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO2, VOC, lead) emissions? If <b>Yes</b> , 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 <b>No</b> , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5.	Has this stationary source <b>added or modified</b> 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 <b>Yes</b> , 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 <b>must</b> be included in HAP emission calculations. If <b>No</b> , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <b>Yes</b> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7.	Are any emission units subject to the federal Acid Rain Program? If <b>Yes</b> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <b>Yes</b> , 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. Is a CAM plan included with this application? 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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> <input checked="" type="checkbox"/>
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 <b>Yes</b> , then a copy must be submitted as part of the ROP renewal application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If <b>Yes</b> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/>	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: <b>AI-SectionC</b>	

**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)]
EU-BOILER1	Natural Gas Fired Boiler	Rule 282(b)(i)	Rule 212(4)(b)
EU-GENERATOR	Natural Gas Fired Generator	Rule 282(b)(i)	Rule 212(4)(d)

Comments:  
See AI\_RICE for a discussion on 40 CFR Part 63 Subpart ZZZZ applicability to EU-GENERATOR.

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

**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.

<p>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 <u>Yes</u>, identify changes and additions on Part F, Part G and/or Part H.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>E2. For each emission unit(s) identified in the existing ROP, <u>all</u> 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 <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u>, identify the stack(s) that was/were not reported on applicable MAERS form(s).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If <u>Yes</u>, complete Part F with the appropriate information.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u>, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Comments:</p>	
<p><input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: <b>AI-</b></p>	

**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.  Yes  No  
 If No, go to Part G.

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
49-18A	EUCOE2	Chain-on-edge number 2 is two (2) automated spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the robot-mounted spray guns. VOC emissions from this line are controlled by a common regenerative thermal oxidizer. This emission unit is considered a PTE.	TBD
49-18A	EUPR1	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO. This emission unit is considered a PTE.	2018
49-18A	EURC1	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO. This emission unit is considered a PTE.	2018
49-18A	EURC2	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO. This emission unit is considered a PTE.	2018
49-18A	EURC3	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO. This emission unit is considered a PTE.	2018

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, identify 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:  
 See AI\_PT1 49-28A for a copy of the newest permit and corresponding emission units. See AI\_ROP Markup for a marked-up copy of the existing ROP that includes the new emission units.

Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-PTI 49-18A, AI\_ROP Markup**



**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
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input type="checkbox"/> Rule 287(2)(c) surface coating line		
<input type="checkbox"/> Rule 290 process with limited emissions		

Comments:  
 The existing ROP currently includes six Rule 281(h)/285(r)(iv) sources (EU002CLEAN/FGCOLDCLEANERS) and a rule 290 source (EURUBBERMIX2/FGRULE290)

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

**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 <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input type="checkbox"/> 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 <u>Yes</u> , 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP?  If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No
H6. Does the source propose to add, change and/or delete <b>source-wide</b> requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input type="checkbox"/> No
H7. Are you proposing to <b>streamline</b> any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

<p>H8. Does the source propose to add, change and/or delete <b>emission limit</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>H9. Does the source propose to add, change and/or delete <b>material limit</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>H10. Does the source propose to add, change and/or delete <b>process/operational restriction</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>H11. Does the source propose to add, change and/or delete <b>design/equipment parameter</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>H12. Does the source propose to add, change and/or delete <b>testing/sampling</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>H13. Does the source propose to add, change and/or delete <b>monitoring/recordkeeping</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>H14. Does the source propose to add, change and/or delete <b>reporting</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

H15. Does the source propose to add, change and/or delete <b>stack/vent restrictions</b> ? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input type="checkbox"/> No
H16. Does the source propose to add, change and/or delete any <b>other</b> requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input type="checkbox"/> No
H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If <u>Yes</u> , identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: <b>AI-</b>	



# 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: E5904

Section Number (if applicable):

1. Additional Information ID  
**AI-**

### Additional Information

2. Is This Information Confidential?

Yes  No

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## 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: E5094

Section Number (if applicable):

1. Additional Information ID

AI-ROP Markup

### Additional Information

2. Is This Information Confidential?

Yes  No

A redline version of MI-ROP-E5094-2018 is attached and includes proposed changes to the ROP.

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**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

EFFECTIVE DATE: October 21, 2018

ISSUED TO

**Hutchinson Antivibration Systems, Inc.**

State Registration Number (SRN): E5094

LOCATED AT:

460 Fuller Avenue NE, Grand Rapids, Michigan 49503

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-E5094-2018

Expiration Date: October 21, 2023

Administratively Complete ROP Renewal Application  
Due Between April 21, 2022 and April 21, 2023

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-E5094-2018

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 Environmental Quality

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Heidi Hollenbach, Grand Rapids District Supervisor

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## 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 Environmental Quality (MDEQ) 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 is 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.

~~This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order AQD No. 25-2016, entered on August 22, 2016 between the MDEQ and the permittee.~~

## 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).<sup>2</sup> **(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:"<sup>2</sup> **(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.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(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).<sup>2</sup> **(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.<sup>2</sup> **(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):
- June 21, 1999,
  - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
  - 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.<sup>2</sup> **(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.<sup>2</sup> **(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, MDEQ.<sup>2</sup> **(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, MDEQ, 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.<sup>2</sup> **(R 336.1201(4))**

#### **Footnotes:**

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

<sup>2</sup>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.

## SOURCE-WIDE CONDITIONS

### POLLUTION CONTROL EQUIPMENT

NA

### I. EMISSION LIMIT(S)

NA

### II. MATERIAL LIMIT(S)

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)

NA

**IX. OTHER REQUIREMENT(S)**

~~1. The conditions contained in this ROP for which a Consent Order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Order. The effective date of termination is defined for the purposes of this condition as the date upon which the Termination Order is signed by the Director of the AQD.~~

**Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

### 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
EUCARBON	Carbon black transport system. Gravity feed of carbon from truck to hopper. Pneumatic transfer of carbon from hopper to four (4) silos, with baghouse filters.	05/01/1988, 06/30/1988	NA
EUMIX	Four rubber mills and one mixer, all venting to one external baghouse.	03/01/1988, 05/01/1988, 12/21/2016	NA
EUWHEEL	Wheelabrator Tumblast, controlled by an externally venting Wheelabrator dust collector.	06/01/1979	NA
EURUBBERMIX2	Rubber mixer controlled by externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.	02/20/2006	FGRULE290
EU002CLEAN	Six small wash stations for cleaning parts.	01/01/1980, 01/01/1981	FGCOLDCLEANERS
EUSIL01	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1988, 05/12/2015	FGRTO FGMMMM <a href="#">FGCAM</a>
EUSIL02	A turbo spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1989, 05/12/2015	FGRTO FGMMMM <a href="#">FGCAM</a>

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSIL03	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1989, 05/12/2015	FGRTO FGMMMM <a href="#">FGCAM</a>
<a href="#">EUSIL04</a>	<del>A spray system used for applying cement to metal and plastic parts. The system consists of a steam heated tunnel, a primer application booth, a topcoat application booth and a steam heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.</del>	<del>10/01/1991, 05/12/2015</del>	<del>FGRTO FGMMMM FGCAM</del>
EUCOE01	Chain-on-edge number 1 is two (2) automated spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the robot-mounted spray guns. VOC emissions from this line are controlled by a common regenerative thermal oxidizer.	08/26/2013, 05/12/2015	FGRTO FGMMMM <a href="#">FGCAM</a>
<a href="#">EUCOE02</a>	<del>Chain-on-edge number 2 is two (2) automated spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the robot-mounted spray guns. VOC emissions from this line are controlled by a common regenerative thermal oxidizer. This emission unit is considered a PTE.</del>	<del>TBD</del>	<del>FGRTO FGMMMM</del>
<a href="#">EUAMS02</a>	<del>A spray system used for applying cement to rubber parts for plastic overmolding. The system consists of an electrical preheater and two (2) topcoat application booths. Automated robot transfer of the parts from the preheat to the booths. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.</del>	<del>12/08/2015</del>	<del>FGRTO FGMMMM FGCAM</del>
<a href="#">EUADHESIVE1 EUPR1</a>	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.	TBD	FGRTO FGMMMM <a href="#">FGCAM</a>
<a href="#">EUADHESIVE2 EURC1</a>	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.	TBD	FGRTO FGMMMM <a href="#">FGCAM</a>
<a href="#">EUADHESIVE3 EURC2</a>	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.	TBD	FGRTO FGMMMM <a href="#">FGCAM</a>
<a href="#">EUADHESIVE4 EURC3</a>	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.	TBD	FGRTO FGMMMM <a href="#">FGCAM</a>

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date/ Modification Date</b>	<b>Flexible Group ID</b>
EUBOILER2	Natural gas fired boiler for building heat; 26.0 MMBtu/hr	01/01/1956	FGDDDDD
EUBOILER4	Natural gas fired boiler for building heat; 12.55 MMBtu/hr	01/22/2018	FGDDDDD

**EUCARBON  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Carbon black transport system; gravity feed of carbon from truck to hopper. Pneumatic transfer of carbon from hopper to four (4) silos with baghouse filters.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Baghouse filters

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lbs. per 1,000 lbs. of exhaust gases, corrected to 50% excess air <sup>2</sup>	Hourly	EUCARBON	GC 13 SC VI.1, VI.2	R 336.1331(1)(a), Table 31, item J

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall not operate the equipment unless the baghouses are installed and operating properly. (R 336.1910)

**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))

1. The permittee shall conduct and record quarterly maintenance checks of equipment. (R 336.1213(3))
2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUCARBON is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include

the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions. **(R 336.1213(3))**

3. The permittee shall monitor and record the pressure drop across the baghouses at least once per operating day. **(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)**

1. The permittee shall not operate EUCARBON unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor. **(R 336.1213(3))**

### **Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).



**EUMIX  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Four rubber mills and one mixer, all venting to one external baghouse.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Fabric filter (baghouse)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	1.44 pounds per hour <sup>2</sup>	monthly average which is calculated using the actual operating hours for that month	EUMIX	GC 13 SC VI.1, VI.3	<b>R 336.1331(1)(c)</b>
2. Particulate	6.29 tons per year <sup>2</sup>	based on a 12-month rolling time period as determined at the end of each calendar month	EUMIX	GC 13 SC VI.1, VI.3	<b>R 336.1331(1)(c)</b>
3. Particulate	0.01 pounds per 1,000 pounds of exhaust gases calculated on a dry gas basis <sup>2</sup>	Hourly	EUMIX	GC 13 SC VI.1, VI.3	<b>R 336.1331(1)(c)</b>
4. Opacity	5% <sup>2</sup>	6-minute average	EUMIX	SC VI.2	<b>R 336.1301(c)</b>

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall not operate the equipment unless the baghouse is installed and operating properly.<sup>2</sup> (**R 336.1910**)

**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))**

1. The permittee shall conduct and record quarterly maintenance checks of equipment.<sup>2</sup> **(R 336.1301, R 336.1331)**
2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUMIX is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions.<sup>2</sup> **(R 336.1301)**
3. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the baghouse at least once per operating day. **(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)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-PULSEJET	43 <sup>2</sup>	33 <sup>2</sup>	<b>R 336.1201(3)</b>

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

1. The permittee shall not operate EUMIX unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor.<sup>2</sup> **(R 336.1301, R 336.1331, R 336.1911)**

### **Footnotes:**

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

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUWHEEL  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Wheelabrator Tumblast (shot blast machine)

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Externally venting Wheelabrator baghouse

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 pound per 1,000 pounds of exhaust gases calculated on a dry gas basis <sup>2</sup>	Hourly	EUWHEEL	GC 13 SC VI.1, VI.2	R 336.1331(1)(a), Table 31, item J

**II. MATERIAL LIMIT(S)**

NA

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

- 1. The permittee shall not operate the tumblast operation unless the baghouse is installed and operating properly.<sup>2</sup> (R 336.1910, R 336.1201)

**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))

- 1. The permittee shall conduct and record quarterly maintenance checks of equipment. (R 336.1213(3))
- 2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUWHEEL is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions. (R 336.1213(3))

- The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the baghouse at least once per operating day. **(R 336.1213(3))**

**VII. REPORTING**

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- 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))**
- 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. SV-WHEEL	15 <sup>2</sup>	26 <sup>2</sup>	<b>R 336.1201(3)</b>

**IX. OTHER REQUIREMENT(S)**

- The permittee shall not operate EUWHEEL unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor. **(R 336.1213)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>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
FGRTO	<del>Two</del> An automated chain-on-edge spray lines, <del>four</del> <del>three</del> (4) Silver spray lines, and <del>an overmolding spray system</del> <del>four adhesive coating lines</del> all used to coat metal and plastic parts. The VOC emissions from these <del>six</del> <del>(6)</del> <del>nine</del> (9) lines are controlled by a common regenerative thermal oxidizer.	EUSIL01, EUSIL02, EUSIL03, <del>EUSIL04</del> , EUCOE01, <del>EUCOE02</del> , <del>EUPR1</del> , <del>EURC1</del> , <del>EURC2</del> , <del>EURC3</del> , <del>EUAMS02</del> <del>EUADHESIVE1</del> , <del>EUADHESIVE2</del> , <del>EUADHESIVE3</del> , <del>EUADHESIVE4</del>
FGMMMM	Each affected source subject to 40 CFR Part 63, Subpart MMMM for the surface coating of miscellaneous metal parts and products.	EUSIL01, EUSIL02, EUSIL03, <del>EUSIL04</del> , EUCOE01, <del>EUCOE02</del> , <del>EUPR1</del> , <del>EURC1</del> , <del>EURC2</del> , <del>EURC3</del> , <del>EUAMS02</del> <del>EUADHESIVE1</del> , <del>EUADHESIVE2</del> , <del>EUADHESIVE3</del> , <del>EUADHESIVE4</del>
FGCAM	<del>40 CFR Part 64, Compliance Assurance Monitoring (CAM) requirements for the pollutant specific emission unit (defined as FGRTO) that has potential pre-control emissions over 100 percent of the major source threshold.</del>	<del>EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4, (FGRTO)</del>
FGDDDDD	Applicable requirements that would apply to affected boilers as described in 40 CFR Part 63, Subpart DDDDD.	EUBOILER2, EUBOILER4
FGRULE290	Rubber mixer controlled by externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.	EURUBBERMIX2
FGCOLDCLEANERS	Six small wash stations for cleaning parts.	EU002CLEAN

**FGRTO  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

An automated chain-on-edge spray line, four (4) Silver spray lines, and an overmolding spray system all used to coat metal and plastic parts. [ALD1]

**Emission Units:** EUSIL01, EUSIL02, EUSIL03, ~~EUSIL04~~, EUCOE01, EUAM02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4, EUPR1, EURC1, EURC2, EURC3

**POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer (RTO), fabric filters

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	50.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGRTO	SC VI.2, VI.3	<b>R 336.1205, R 336.1702(a), Paragraph 9.A.1 Consent Order AQD No. 25-2016</b>
2. VOCs	23.6 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	<u>EUPR1, EURC1, EURC2, and EURC3 combined</u> <u>EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, and EUADHESIVE4 collectively</u>	SC VI.2, SC VI.4	<b>R 336.1205, R 336.1702(a)</b>
3. Ethylbenzene	2.3 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	<u>EUPR1, EURC1, EURC2, and EURC3 combined</u> <u>EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, and EUADHESIVE4 collectively</u>	SC VI.6	<del><b>R 336.1224,</b></del> <b>R 336.1225</b>

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Methyl isobutyl ketone	11.0 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	<a href="#">EUPR1, EURC1, EURC2, and EURC3 combined</a> <a href="#">EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, And EUADHESIVE4 collectively</a>	SC VI.6	<a href="#">R 336.1224, R 336.1225</a>

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.<sup>2</sup> ([R 336.1224, R 336.1702\(a\), Paragraph 9.A.1 Consent Order AQD No. 25-2016](#))
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> ([R 336.1224, R 336.1370, Paragraph 9.A.1 Consent Order AQD No. 25-2016](#))
3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.<sup>2</sup> ([R 336.1224, R 336.1702\(a\), Paragraph 9.A.1 Consent Order AQD No. 25-2016](#))
4. The permittee shall not operate FGRTTO unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.<sup>2</sup> ([R 336.1225, R 336.1702\(a\), R 336.1910, R 336.1911, 40 CFR 52.21\(c\) and \(d\), Paragraph 9.A.1 Consent Order AQD No. 25-2016](#))

5. The permittee shall maintain a facial velocity of 200 feet per minute through each natural draft opening of each PTE on a 3-hour block average basis.<sup>2</sup> ([R 336.1702\(a\), R 336.1910, Paragraph 9.A.1 Consent Order AQD No. 25-2016](#))

6. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f) for non-PTE enclosures.<sup>2</sup> (R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate the spray booths in FGRT0 unless all respective exhaust filters are installed and operating in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
2. The permittee shall equip and maintain each spray booth in FGRT0 with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.<sup>2</sup> (R 336.1702(a), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
3. The permittee shall not operate FGRT0 unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC control efficiency (combined capture and destruction efficiencies) of 85 percent (by weight), maintaining a minimum temperature of 1,450°F, and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1,450°F based upon a 3-hour block average.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1299, R 336.1702, R 336.1910, 40 CFR 64.6(c)(1)(i), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis during operation of any portion of FGRT0.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1299, R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
5. If the enclosure is a PTE, the permittee shall not operate ~~EUSIL01, EUSIL02, EUSIL03, EUAM02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4~~ unless the respective PTE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following:<sup>2</sup> (R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
  - a. The direction of the air flow at all times must be into the enclosure; and either
  - b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.
6. If the enclosure is not a PTE, the permittee shall not operate ~~EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUAM02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4~~ unless the respective enclosure is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following:<sup>2</sup> (R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
  - a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

#### **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 determine the VOC content, water content, and density of any adhesives and coatings, as applied and as received, randomly on a yearly basis with all coatings and adhesives tested within a five-year period using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
2. ~~By February 1, 2019 or an alternate date with prior approval of the AQD District Supervisor, the permittee shall determine the overall VOC control efficiency of FGRT0, the capture efficiency of the emission units in FGRT0~~



~~(including EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4), and the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and 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. Thereafter, the permittee must complete the testing once every five years from the most recent test. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a), R 336.1902, R 336.1910, R 336.2001, R 336.2003, R 336.2004, Paragraph 9.A.1 Consent Order AQD No. 25-2016) Within 180 days of startup of EU COE2 and afterwards upon request of the AQD District Supervisor, the permittee shall determine the overall VOC control efficiency of FGRTO, the capture efficiency of the emission units in FGRTO (including EUPR1, EURC1, EURC2, EURC3), and the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. Thereafter, the permittee must complete the testing once every five years from the most recent test. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205, R 336.1225, R 336.1702(a), R 336.1902, R 336.1910)~~

3. At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down spray booth operations when the temperature of the regenerative thermal oxidizer drops below the minimum temperature requirement. Verification of the interlock system's operational integrity shall be conducted using methods, plans and procedures approved by the AQD prior to testing. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. **(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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1299, R 336.1702, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each adhesive, coating, thinner, solvent, additive and catalyst, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
3. The permittee shall keep the following information on a monthly basis for FGRTTO:
  - a. Gallons (with water) of each adhesive, coating, thinner, solvent, additive and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive and catalyst used to coat plastic parts.
  - b. Where applicable, gallons (with water) of each material reclaimed.
  - c. VOC content (with water) of each material as applied.
  - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD District Supervisor.<sup>2</sup> (R 336.1205, R 336.1702(a), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

4. The permittee shall keep the following information on a monthly basis for EUPR1, EURC1, EURC2, and EURC3:
  - a) Gallons (with water) of each adhesive, coating, thinner, solvent, additive and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive and catalyst used to coat plastic parts.
  - b) Where applicable, gallons (with water) of each material reclaimed.
  - c) VOC content (with water) of each material as applied.
  - d) VOC mass emission calculations for EUPR1, EURC1, EURC2, and EURC3 combined determining the monthly emission rate in tons per calendar month.
  - e) VOC mass emission calculations for EUPR1, EURC1, EURC2, and EURC3 combined determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.The records shall be kept using mass balance or an alternative method and format acceptable to the AQD District Supervisor. (R 336.1205, R 336.1702(a))
5. The permittee shall keep the following information on a monthly basis for all adhesive coating lines:
  - a. Gallons (with water) of each ethylbenzene and methyl isobutyl ketone containing material used.
  - b. Where applicable, gallons (with water) of each ethylbenzene and methyl isobutyl ketone containing material reclaimed.
  - c. The ethylbenzene and methyl isobutyl ketone content (with water) in pounds per gallon of each material used.
  - d. Ethylbenzene and methyl isobutyl ketone mass emission calculations determining the monthly emission rate in tons per calendar month.
  - e. Ethylbenzene and methyl isobutyl ketone mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1224, R 336.1225)

6. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the RTO on a continuous basis, during operation of FGRTTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request.<sup>2</sup> (R 336.1205, R 336.1299, R 336.1702, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

7. The permittee shall keep, in a satisfactory manner, operating temperature records for the RTO as required by SC IV.3. If the measured operating temperature of the RTO falls below 1,450°F during operation of FGRT0, the permittee may demonstrate compliance based upon a three-hour block average temperature, by calculating the average operating temperature for each three hour period which includes one or more temperature readings below 1,450°F. The permittee shall keep all records and calculations on file at the facility and make them available to the Department upon request.<sup>2</sup> (**R 336.1205, R 336.1225, R 336.1299, R 336.1702, R 336.1910, 40 CFR Part 63, Subpart M**~~MMM, Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

**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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of ~~the new EUCOE2 each adhesive coating line (EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, and EUADHESIVE4).~~<sup>2</sup> **(R 336.1201(7)(a))**
- ~~5. The permittee shall notify the AQD District Supervisor, in writing, of the installation of the second adhesive line (EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4).<sup>4</sup> **(R 336.1225)**~~

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. SVRTO	24 <sup>2</sup>	38 <sup>2</sup>	R 336.1225, 40 CFR 52.21(c) & (d), <b>Paragraph 9.A.1 Consent Order AQD No. 25-2016</b>

**IX. OTHER REQUIREMENT(S)**

- ~~1. The permittee shall cease operation of EUSIL04 upon the installation of the second adhesive line (EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4). The permittee shall notify the District Supervisor upon the installation of the second adhesive line and the removal of EUSIL04.<sup>4</sup> **(R 336.1225)**~~
- ~~2.1.~~ The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and MMMM as they apply to FGRT0.<sup>2</sup> **(40 CFR Part 63, Subpart A and Subpart MMMM, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
- ~~3.2.~~ The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP as they apply to FGRT0.<sup>2</sup> **(40 CFR Part 63, Subpart A and Subpart PPPP)**

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGMMMM  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Each affected source subject to 40 CFR Part 63, Subpart MMMM for the surface coating of miscellaneous metal parts and products.

**Emission Units:** ~~EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, EURC3, EUSIL04, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4~~

**POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer (RTO)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	37.7 lbs per gal of coating solids <sup>2</sup>	12-month rolling time period, as determined at the end of each calendar month	Existing – Rubber-to-Metal Coating	SC V.1, VI.1 through VI.10	<b>40 CFR 63.3890(b)(4), Paragraph 9.B.1 Consent Order AQD No. 25-2016</b>

2. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(a) through (c):
  - a. Compliant material option,
  - b. Emission rate without add-on controls option, or
  - c. Emission rate with add-on controls option.

The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials used when determining the emission rate.<sup>2</sup> **(40 CFR 63.3891, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

3. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the applicable emission limits at all times except during periods of startup, shutdown, and malfunction.<sup>2</sup> **(40 CFR 63.3900(a)(2)(i), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
4. If the permittee owns or operates an affected source that meets the applicability criteria of this subpart and at the same facility performs surface coating that meets the applicability criteria of any other final surface coating NESHAP in this part, the permittee may comply with a facility-specific emission limit. The procedures for calculating the facility-specific emission limit are specified in 40 CFR 63.3890(c)(2). If the facility-specific emission limit is used, then the permittee must include coating activities that meet the applicability criteria of the other subcategories that constitute more than 1% of the total coating activities. Compliance with the facility-specific emission limit and the emission limitations for all surface coating operations can be used for compliance with this and other applicable surface coating NESHAP.<sup>2</sup> **(40 CFR 63.3881(e), 40 CFR 63.3890(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

**II. MATERIAL LIMIT(S)**

NA

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

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart M as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3967. **(40 CFR 63.3892(b) and Table 1, ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**

Add-on Control Device	Operating Limit
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).
Emission capture system that is a PTE according to 40 CFR 63.3965(a).	a. The direction of the air flow at all times must be into the enclosure; and b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.
Emission capture system that is not a PTE according to 40 CFR 63.3965(a).	a. The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device according to 40 CFR 63.3967(f).

2. For any coating operation(s) using the emission rate with add-on controls option, 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/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The work practice plan shall specify practices and procedures to ensure at a minimum the following elements are implemented:
  - a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.<sup>2</sup> **(40 CFR 63.3893(b)(1), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.<sup>2</sup> **(40 CFR 63.3893(b)(2), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.<sup>2</sup> **(40 CFR 63.3893(b)(3), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.<sup>2</sup> **(40 CFR 63.3893(b)(4), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.<sup>2</sup> **(40 CFR 63.3893(b)(5), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - f. 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).<sup>2</sup> **(40 CFR 63.3893(c), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**

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).<sup>2</sup> **(40 CFR 63.3893(c), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**

3. If the affected source uses an emission capture system and add-on control device, the permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. 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.<sup>2</sup> (40 CFR 63.3900(c), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))

4. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction.<sup>2</sup> (40 CFR 63.3900(a)(2)(ii), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))
5. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the work practice standards in 40 CFR 63.3893 at all times.<sup>2</sup> (40 CFR 63.3900(a)(2)(iii), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall not operate FGMMM unless the RTO is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (40 CFR 63.3892(b), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.3931)

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall conduct each performance test required by 40 CFR 63.3960 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.3964(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h).<sup>2</sup> (40 CFR 63.3964(a), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))
2. The permittee shall conduct each performance test of an emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.3965 and 40 CFR 63.3966.<sup>2</sup> (40 CFR 63.3964(b), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.3931)

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12<sup>th</sup> month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months.<sup>2</sup> (40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960, [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))
2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931.<sup>2</sup> (40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))
3. The permittee shall maintain, at a minimum, the following records for each compliance period:
  - a. A copy of each notification and report that is submitted to comply with Subpart MMMM, and the documentation supporting each notification and report.<sup>2</sup> (40 CFR 63.3930(a), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))
  - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating.<sup>2</sup> (40 CFR 63.3930(b), [Paragraph 9.B.1 Consent Order AQD No. 25-2016](#))

- c. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used.<sup>2</sup> **(40 CFR 63.3930(c)(1), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - d. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.3930(c)(4)(i) through (v).<sup>2</sup> **(40 CFR 63.3930(c)(4), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - e. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the volume used.<sup>2</sup> **(40 CFR 63.3930(d), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - f. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight.<sup>2</sup> **(40 CFR 63.3930(e), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - g. The volume fraction of coating solids for each coating used during each compliance period.<sup>2</sup> **(40 CFR 63.3930(f), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - h. For the emission rate with add-on controls option, the density of each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(g), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - i. The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4).<sup>2</sup> **(40 CFR 63.3930(h), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - j. The date, time, and duration of each deviation.<sup>2</sup> **(40 CFR 63.3930(j), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
  - k. For the emission rate with add-on controls option, records specified in 40 CFR 63.3930(k)(1) through 40 CFR 63.3930(k)(8).<sup>2</sup> **(40 CFR 63.3930(k), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
4. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 of 40 CFR Part 63, Subpart Mmmm using the applicable method(s) described below:<sup>2</sup> **(40 CFR 63.3963(c), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).	i. Collect the combustion temperature data according to 40 CFR 63.3968(c); ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
Emission capture system that is a PTE according to 40 CFR 63.3965(a).	a. The direction of the air flow at all times must be into the enclosure; and b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.	i. Collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.3968(g)(1); and ii. Maintain the facial velocity of air flow through all natural draft openings at or above the facial velocity limit and maintain the direction of air flow into the enclosure at all times.



Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Emission capture system that is not a PTE according to 40 CFR 63.3965(a).	a. The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device according to 40 CFR 63.3967(f).	i. Collect the gas volumetric flow rate for each capture device according to 40 CFR 63.3968(g); ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average gas volumetric flow rate for each capture device at or above the gas volumetric flow rate.

5. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to the procedures in 40 CFR 63.3961.<sup>2</sup> **(40 CFR 63.3963, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
6. During the performance test required by 40 CFR 63.3960, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.3967 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.3892.<sup>2</sup> **(40 CFR 63.3967, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.3968(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.3968(b).<sup>2</sup> **(40 CFR 63.3968, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
8. The permittee must apply to the USEPA for approval of alternative monitoring under 40 CFR 63.8(f), if using an add-on control device other than those listed in Table 1 of 40 CFR Part 63, Subpart M, or to monitor an alternative parameter and comply with a different operating limit.<sup>2</sup> **(40 CFR 63.3892(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

## 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 the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7):
  - a. The organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890.<sup>2</sup> **(40 CFR 63.3963(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - b. An operating parameter is out of the allowed range.<sup>2</sup> **(40 CFR 63.3963(c)(1), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened.<sup>2</sup> **(40 CFR 63.3963(d), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - d. Deviations from work practice standards occur.<sup>2</sup> **(40 CFR 63.3963(e), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

5. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910.<sup>2</sup> **(40 CFR Part 63, Subparts A and MMMM, ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
6. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance.<sup>2</sup> **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for emission capture systems and add-on control devices.<sup>2</sup> **(40 CFR 63.3920(b), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**
8. If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit an SSM report as specified in 40 CFR 63.3920(c).<sup>2</sup> **(40 CFR 63.3920(c), 40 CFR 63.10(d), ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**

See Appendix 8

#### **VIII. STACK/VENT RESTRICTION(S)**

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 MMMM for Surface Coating of Miscellaneous Metal Parts and Products.<sup>2</sup> **(40 CFR Part 63, Subparts A and MMMM, ~~Paragraph 9.B.1 Consent Order AQD No. 25-2016~~)**

#### **Footnotes:**

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

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **FGCAM FLEXIBLE GROUP CONDITIONS**

### **DESCRIPTION**

~~40 CFR Part 64, Compliance Assurance Monitoring (CAM) requirements for the pollutant specific emission unit (defined as FGRT0) that has potential pre-control emissions over 100 percent of the major source threshold.~~

~~**Emission Units:** EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4, (FGRT0)~~

### **POLLUTION CONTROL EQUIPMENT**

~~Regenerative Thermal Oxidizer~~

#### **I. EMISSION LIMIT(S)**

~~NA~~

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

~~NA~~

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

~~NA~~

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

~~1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis during operation of any portion of FGRT0. **(40 CFR 64.6(c)(1)(i) and (ii))**~~

#### **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))**~~

~~1. The permittee shall continuously monitor combustion chamber temperature and record the combustion temperature data per FGRT0, SC VI.6 and VI.7. The average combustion temperature in any 3-hour period must not fall below the indicator combustion temperature identified in Appendix 3. **(40 CFR 64.6(c)(1)(i) and (ii))**~~

~~2. The permittee shall verify the accuracy of chamber thermocouples on a monthly basis. **(40 CFR 64.6(c)(1)(iii))**~~

~~3. The permittee shall continuously monitor the air flow to the RTO using the CPMS. The air flow to the RTO shall not fall outside the indicator range identified in Appendix 3. **(40 CFR 64.6(c)(1)(i) and (ii))**~~

~~4. The permittee shall verify the capture system for a non-PTE (EUSIL01) by monitoring the average gas volumetric flow rate in the duct between the capture device and the add-on control device inlet in accordance with 40 CFR 63.3965(a). The average volumetric flow rate shall not fall below the indicator range identified in Appendix 3. **(40 CFR 64.3(a)(2))**~~

5. ~~The permittee shall monitor the capture system that is a PTE by determining the average facial velocity of air through all natural draft openings in the enclosure in accordance with 40 CFR 63.3968(g)(1). The average facial velocity shall be determined by monitoring the booth exhaust airflow (in cfm) and ensuring that the airflow does not fall below the following indicator ranges identified in Appendix 3. (40 CFR 64.3(a)(2))~~
6. ~~The permittee shall verify the accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage on a monthly basis. (40 CFR 64.6(c)(1)(iii))~~
7. ~~The permittee shall evaluate the capture system that is a PTE by continuously monitoring the pressure of airflow to determine the direction of airflow into the enclosure. The pressure shall be continuously monitored on the CPMS and shall be negative. (40 CFR 64.3(a)(2))~~
8. ~~An excursion is a departure from the indicator ranges identified in Appendix 3. (40 CFR 64.6(c)(2))~~
9. ~~Upon detecting an excursion or exceedance, the owner or operator shall immediately cease operation of FGRTQ and shall restore normal operation of FGRTQ (including the control device and associated capture system) as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions prior to restarting operations. 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). See Appendix 3 for the corrective action plan. (40 CFR 64.7(d))~~
10. ~~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))~~
11. ~~The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))~~
12. ~~The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. (40 CFR 64.9(b)(1))~~
13. ~~The permittee shall determine the average of all recorded readings for each successive 3 hour period of the emission capture system and add-on control device operation. (40 CFR 64.3(a)(2))~~

**See Appendix 3**

**VII. REPORTING**

1. ~~Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~
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 and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. (40 CFR 64.9(a)(2)(i))~~
- ~~5. Each semiannual 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))~~
- ~~6. Each semiannual report of monitoring and deviations shall include a description of the actions taken to implement a QIP during the reporting period (if appropriate). If a QIP has been completed, the report shall include documentation that the plan has been implemented and if it has reduced the likelihood of excursions or exceedances. (40 CFR 64.9(a)(2)(iii))~~

~~See Appendix 8~~

### ~~VIII. STACK/VENT RESTRICTION(S)~~

~~NA~~

### ~~IX. OTHER REQUIREMENTS~~

- ~~1. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)~~
- ~~2. 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 ROP 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))~~
- ~~3. The permittee shall submit a QIP if 6 excursions occur in any 3-month period. (40 CFR 64.8(a))~~

#### **Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGDDDD**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Requirements for existing Gas 1, (Natural Gas only) for new and existing Boilers and Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These boilers or process heaters must comply with this subpart except as provided in 40 CFR 63.6(i).

**Emission Units:** EUBOILER2, EUBOILER4

The collection at a major source of all existing industrial, commercial, and institutional boilers and process heaters within the units designed to burn gas 1 fuel subcategory as defined in 40 CFR 63.7575. At the time of permit renewal:

Less than 5 MMBtu/hr	NA
Equal to or greater than 5 MMBtu/hr and less than 10 MMBtu/hr	NA
Equal to or greater than 10 MMBtu/hr	EUBOILER2 EUBOILER4

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

- 1. The permittee shall only burn natural gas. **(40 CFR 63.7499(I))**

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

- 1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler or process heater at the source. **(40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)**
- 2. The permittee must operate and maintain affected sources 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. **(40 CFR 63.7500(a)(3))**
- 3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. **(40 CFR 63.7500(b))**
- 4. The permittee must:
  - a. Complete a tune-up every 5 years (61 months) for boilers/process heaters less than or equal to 5 million Btu per hour. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**
  - b. Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**
  - c. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. **(40 CFR 63.7540(a)(10), 40 CFR 63.7515(d))**

- d. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. **(40 CFR 63.7540(a)(13))**
  - e. Follow the procedures described in SC IX 4.a through SC IX 4.f for all initial and subsequent tune ups. **(40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)**
  - f. Complete the Initial tune ups on all affected units no later than January 31, 2016, except as provided in **40 CFR 63.7510(j)** and **40 CFR 63.7540(a)(13)**.
5. For EU-BOILER2, the permittee must complete the one-time energy assessment no later than January 31, 2016. **(40 CFR 63.7510(e))**
  6. For EU-BOILER4, the permittee must complete the one-time energy assessment no later than 180 days after startup. **(40 CFR 63.7510(e))**
  7. For affected sources, as defined in 40 CFR 63.7490, that switch subcategory consistent with 40 CFR 63.7545(h) after the initial compliance date, you must demonstrate compliance within 60 days of the effective date of the switch, unless you had previously conducted your compliance demonstration for this subcategory within the previous 12 months. **(40 CFR 63.7510(k))**

#### **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))**

1. The permittee must keep a copy of each notification and report 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))**
2. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. **(40 CFR 63.7560(a), (b), and (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. The permittee must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60<sup>th</sup> day following the completion of the initial compliance demonstrations for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following

information and must be submitted within 60 days of the compliance date specified at 40 CFR 63.7495(b). **(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 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. **(40 CFR 63.7545(e)(1))**
  - b. Certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR 63.7545(e)(8))**
    - i. "This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR 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))**
5. The permittee must submit boiler tune-up compliance reports. The first compliance report shall cover the period January through December of the year in which the tune up was completed and must be postmarked or submitted no later than March 15<sup>th</sup> of the reporting year that immediately follows the year in which the tune-up was completed. 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 40 CFR 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 40 CFR 63.7495. Each subsequent semiannual 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. Each subsequent semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, 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 March 15. Compliance reports must be submitted using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to the Air Quality Division and EPA Region 5. At the discretion of the Administrator, the permittee must submit these reports, in the format specified by the Administrator. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. **(40 CFR 63.7550(b), 40 CFR 63.10(a)(5), 40 CFR 63.7550(h)(3))**
6. 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 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 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))**
7. The permittee must include the following information in the compliance report. **(40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))**
- a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
  - b. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**
  - c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
  - d. Include the date of the most recent tune-up for each unit. 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))**
  - e. 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))**

See Appendix 8

### VIII. STACK/VENT RESTRICTION(S)

NA



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

1. The permittee must comply with applicable provisions of 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7495(b))**
2. The permittee must be in compliance with the applicable work practice standards. **(40 CFR 63.7505(a))**
3. For affected sources (as defined in 40 CFR 63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. **(40 CFR 63.7515(g))**
4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: **(40 CFR 63.7540(a))**
  - a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
  - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.7540(a)(10)(iii))**
  - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
  - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
  - f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below. **(40 CFR 63.7540(a)(10)(vi))**
    - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
    - ii. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
    - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**
5. If the boiler or process heater has a heat input capacity of less than or equal to 5 million Btu per hour, the permittee may delay the burner inspection specified in SC IX 4.a until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. . If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. **(40 CFR 63.7540(a)(12))**

### **Footnotes:**

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

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## 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, 278a and 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

**Emission Units installed prior to December 20, 2016: EURUBBERMIX2**

### 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(2)(a)(i))**
  
2. Any emission unit for which CO<sub>2</sub> equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other 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(2)(a)(ii))**
  - a. For toxic 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 micrograms 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(2)(a)(ii)(A))**
  
  - b. For toxic 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(2)(a)(ii)(B))**
  
  - c. The emission unit shall not emit any toxic 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(2)(a)(ii)(C))**
  
  - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(D))**
  
  - e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(E))**
  
3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: **(R 336.1290(2)(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 exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**
- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(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)**
2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:
  - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following **(R 336.1290(2)(b)(i), R 336.1910)**
    - i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
    - ii. Wet scrubbers equipped with a liquid flow rate monitor.
    - iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
  - b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. **(R 336.1290(2)(b)(ii), R 336.1910)**

## **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 DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a 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(2)(a)(ii) and (iii). **(R 336.1213(3))**
  - e. Records of 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. Volatile organic compound emissions shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**
  - f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**
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(2)(c), R 336.1213(3))**
  - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(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(2)(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

## **FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS**

### **DESCRIPTION**

Six small wash stations for cleaning parts.

**Emission Unit:** EU002CLEAN

### **POLLUTION CONTROL EQUIPMENT**

NA

### **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(2)(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(2)(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(2)(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

## **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. Acronyms and Abbreviations

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 <sub>2</sub> e	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 Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H <sub>2</sub> S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO <sub>x</sub>	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO <sub>2</sub>	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 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

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FGCAM. The following indicator operating ranges, or alternate values as established through testing, shall be used to satisfy monitoring in FGCAM. Any changes to the values below shall be updated in the source's Malfunction Abatement Plan.

Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
RTO	Temperature	Minimum 1577°F (3-hour block average)	Continuous	Do not operate the coating processes unless the RTO is within the proper operating range.
				In the event of an RTO system fault, the system will shut down and sound an alarm. If the RTO faults and shuts down, all coating operations must be stopped as quickly as possible.
				The fault should be examined to determine the cause of the out of range reading and a repair determined. After the problem has been fixed, the RTO system must be restarted as per the SSMP to return the unit to operation before coating operations can resume.
Non-PeTE for EUSIL01	Stack CFM	CFM greater than 2,369 (3-hour block average)	Continuous	Do not operate the coating process required to be inside the non-permanent total enclosure unless the exhaust CFM is above the operating limit noted.
				If the CFM minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL02	Airflow direction	Toward RTO (into booth)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless the face velocity is above the operating limit noted.
	Face Velocity	CFM greater than 236 (equivalent to 200 FPM at NDO's) (3-hour block average)		If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL03	Airflow direction	Toward RTO (into booth)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
	Stack CFM	CFM greater than 554 (equivalent to 200 FPM at NDO's) (3-hour block average)		If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL04	Airflow direction	Toward RTO (into booth)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
	Stack CFM	CFM greater than 502		If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating

		(equivalent to 200 FPM at NDO's (3-hour block average))		method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUCOE01	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 296 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUPR1	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 174 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EURC1	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 174 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EURC2	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 174 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EURC3	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 174 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUAMS02	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 6 (equivalent to	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the

		200 FPM at NDC's (3-hour block average)		<del>transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.</del> <del>In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.</del>
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#### 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

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. 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-E5094-2012. 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-E5094-2012c is being reissued as Source-Wide PTI No. MI-PTI-E5094-2018.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
49-18	201800080	Addition of four new adhesive coating lines	FGRTO
183-16	201700036	Replace the rubber mixer.	EUMIX
54-06B	201500083	New plastic parts coating line to existing metal parts coating lines.	FGRTO
54-06A	201300197	New chain on edge machine to apply adhesives.	FGRTO
<a href="#">49-18A</a>		<a href="#">New chain on edge machine to apply adhesives.</a>	<a href="#">FGRTO</a>

#### Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

#### Appendix 8. Reporting

##### A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, 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.



## 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: E5094

Section Number (if applicable):

1. Additional Information ID

AI-PTI 49-2A

### Additional Information

2. Is This Information Confidential?

Yes  No

Permit to Install 49-18A (attached) was issued October 20, 2021 and contains new emission units EUCOE2, EUPR1, EURC1, EURC2, EURC3. These conditions should be incorporated into the ROP,

Page of

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

October 20, 2021

**PERMIT TO INSTALL  
49-18A**

**ISSUED TO**  
Hutchinson Antivibration Systems, Inc.

**LOCATED AT**  
460 Fuller Avenue, NE  
Grand Rapids, Michigan 49503

**IN THE COUNTY OF**  
Kent

**STATE REGISTRATION NUMBER**  
E5094

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: <b>July 16, 2021</b>	
DATE PERMIT TO INSTALL APPROVED: <b>October 20, 2021</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**

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## COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

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

### POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO <sub>2</sub>	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

## GENERAL CONDITIONS

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

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

## EMISSION UNIT SPECIAL CONDITIONS

### EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUSIL01	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1988, 05/12/2015	FGRTO FGMMMM FGCAM
EUSIL02	A turbo spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer. This emission unit is considered a PTE.	1989, 05/12/2015	FGRTO FGMMMM FGCAM
EUSIL03	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer. This emission unit is considered a PTE.	1989, 05/12/2015	FGRTO FGMMMM FGCAM
EUSIL04	A spray system used for applying cement to metal and plastic parts. The system consists of a steam heated tunnel, a primer application booth, a topcoat application booth and a steam heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer. This emission unit is considered a PTE.	10/01/1991, 05/12/2015	FGRTO FGMMMM FGCAM
EUCOE01	Chain-on-edge number 1 is two (2) automated spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the robot-mounted spray guns. VOC emissions from this line are controlled by a common regenerative thermal oxidizer.	08/26/2013, 05/12/2015	FGRTO FGMMMM FGCAM

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EUCOE02	Chain-on-edge number 2 is two (2) automated spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the robot-mounted spray guns. VOC emissions from this line are controlled by a common regenerative thermal oxidizer. This emission unit is considered a PTE.	TBD	FGRTO FGMMMM FGCAM
EUPR1	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO. This emission unit is considered a PTE.	2018	FGRTO FGMMMM FGCAM
EURC1	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO. This emission unit is considered a PTE.	2018	FGRTO FGMMMM FGCAM
EURC2	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO. This emission unit is considered a PTE.	2018	FGRTO FGMMMM FGCAM
EURC3	An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO. This emission unit is considered a PTE.	2018	FGRTO FGMMMM FGCAM

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

## FLEXIBLE GROUP SPECIAL CONDITIONS

### FLEXIBLE GROUP SUMMARY TABLE

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

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGRTO	An automated chain-on-edge spray line, four (4) Silver spray lines, and an overmolding spray system all used to coat metal and plastic parts. The VOC emissions from these six (6) lines are controlled by a common regenerative thermal oxidizer.	EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUCOE2, EUPR1, EURC1, EURC2, EURC3
FGMMMM	Each affected source subject to 40 CFR Part 63, Subpart MMMM for the surface coating of miscellaneous metal parts and products.	EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUCOE2, EUPR1, EURC1, EURC2, EURC3

**FGRTO  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

An automated chain-on-edge spray line, four (4) Silver spray lines, and an overmolding spray system all used to coat metal and plastic parts.

**Emission Unit:** EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, EURC3

**POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer (RTO), fabric filters

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC	50.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGRTO	SC VI.2, SC VI.3	R 336.1205, R 336.1702(a)
2. VOCs	23.6 tpy	12-month rolling time period as determined at the end of each calendar month	EUPR1, EURC1, EURC2, and EURC3 combined	SC VI.2, SC VI.4	R 336.1205, R 336.1702(a)
3. Ethylbenzene	2.3 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	EUPR1, EURC1, EURC2, and EURC3 combined	SC VI.5	R 336.1225
4. Methyl isobutyl ketone	11.0 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	EUPR1, EURC1, EURC2, and EURC3 combined	SC VI.5	R 336.1225

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1702(a))**



4. The permittee shall not operate FGRTO unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))**

5. The permittee shall maintain a facial velocity of 200 feet per minute through each natural draft opening of each PTE on a 3-hour block average basis. **(R 336.1702(a), R 336.1910)**
6. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f) for non-PTE enclosures. **(R 336.1702(a), R 336.1910)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate the spray booths in FGRTO unless all respective exhaust filters are installed and operating in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain each spray booth in FGRTO with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**
3. The permittee shall not operate FGRTO unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC control efficiency (combined capture and destruction efficiencies) of 85 percent (by weight), maintaining a minimum temperature of 1,450°F, and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1,450°F based upon a 3-hour block average. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910)**
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis during operation of any portion of FGRTO. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910)**
5. If the enclosure is a PTE, the permittee shall not operate EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE2, EUPR1, EURC1, EURC2, EURC3 unless the respective PTE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following: **(R 336.1702(a), R 336.1910)**
  - a) The direction of the air flow at all times must be into the enclosure
  - b) The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.

6. If the enclosure is not a PTE, the permittee shall not operate EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUCOE2, EUPR1, EURC1, EURC2, EURC3 unless the respective enclosure is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following: **(R 336.1702(a), R 336.1910)**
- a) The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

## **V. TESTING/SAMPLING**

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

1. The permittee shall determine the VOC content, water content, and density of any adhesives and coatings, as applied and as received, randomly on a yearly basis with all coatings and adhesives tested within a five-year period using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1702)**
2. Within 180 days of startup of EUCOE2 and afterwards upon request of the AQD District Supervisor, the permittee shall determine the overall VOC control efficiency of FGRTO, the capture efficiency of the emission units in FGRTO (including EUPR1, EURC1, EURC2, EURC3), and the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. Thereafter, the permittee must complete the testing once every five years from the most recent test. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1902, R 336.1910)**

## **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each adhesive, coating, thinner, solvent, additive and catalyst, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. **(R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a monthly basis for each emission unit under FGRTO:
  - a) Gallons (with water) of each adhesive, coating, thinner, solvent, additive and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive and catalyst used to coat plastic parts.
  - b) Where applicable, gallons (with water) of each material reclaimed.
  - c) VOC content (with water) of each material as applied.
  - d) VOC mass emission calculations for FGRTO determining the monthly emission rate in tons per calendar month.
  - e) VOC mass emission calculations for FGRTO determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept using mass balance or an alternative method and format acceptable to the AQD District Supervisor. **(R 336.1205, R 336.1702(a))**

4. The permittee shall keep the following information on a monthly basis for EUPR1, EURC1, EURC2, and EURC3:
- Gallons (with water) of each adhesive, coating, thinner, solvent, additive and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive and catalyst used to coat plastic parts.
  - Where applicable, gallons (with water) of each material reclaimed.
  - VOC content (with water) of each material as applied.
  - VOC mass emission calculations for EUPR1, EURC1, EURC2, and EURC3 combined determining the monthly emission rate in tons per calendar month.
  - VOC mass emission calculations for EUPR1, EURC1, EURC2, and EURC3 combined determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept using mass balance or an alternative method and format acceptable to the AQD District Supervisor. **(R 336.1205, R 336.1702(a))**

5. The permittee shall keep the following information on a monthly basis for all adhesive coating lines:
- Gallons (with water) of each ethylbenzene and methyl isobutyl ketone containing material used.
  - Where applicable, gallons (with water) of each ethylbenzene and methyl isobutyl ketone containing material reclaimed.
  - The ethylbenzene and methyl isobutyl ketone content (with water), each separately, in pounds per gallon or weight percent of each TAC-containing material used.
  - Ethylbenzene and methyl isobutyl ketone mass emission calculations, each separately, determining the monthly emission rate in tons per calendar month.
  - Ethylbenzene and methyl isobutyl ketone mass emission calculations, each separately, determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

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

6. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the RTO on a continuous basis, during operation of FGRTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1702)**
7. The permittee shall keep, in a satisfactory manner, operating temperature records for the RTO as required by SC IV.3. If the measured operating temperature of the RTO falls below 1,450°F during operation of FGRTO, the permittee may demonstrate compliance based upon a three-hour block average temperature, by calculating the average operating temperature for each three-hour period which includes one or more temperature readings below 1,450°F. The permittee shall keep all records and calculations on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910)**

## **VII. REPORTING**

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of the new EUCOE2. **(R 336.1201(7)(a))**

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVRTO	24	38	R 336.1225, 40 CFR 52.21(c) & (d)

**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, Subparts A and M MMM as they apply to FGRT0. **(40 CFR Part 63, Subpart A and Subpart M MMM)**

**Footnotes:**

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

**FGMMMM**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Each affected source subject to 40 CFR Part 63, Subpart MMMM for the surface coating of miscellaneous metal parts and products.

**Emission Unit:** EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, EURC3

**POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer (RTO), fabric filters

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. Organic HAP	37.7 lbs per gal of coating solids <sup>2</sup>	12-month rolling time period, as determined at the end of each calendar month	Existing – Rubber-to-Metal Coating	SC V.1 SC VI.1 through SC VI.10	40 CFR 63.3890(b)(4)

2. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(a) through (c):

- a) Compliant material option,
- b) Emission rate without add-on controls option, or
- c) Emission rate with add-on controls option.

The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials used when determining the emission rate. **(40 CFR 63.3891)**

3. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the applicable emission limits at all times except during periods of startup, shutdown, and malfunction. **(40 CFR 63.3900(a)(2)(i))**

4. If the permittee owns or operates an affected source that meets the applicability criteria of this subpart and at the same facility performs surface coating that meets the applicability criteria of any other final surface coating NESHAP in this part, the permittee may comply with a facility-specific emission limit. The procedures for calculating the facility-specific emission limit are specified in 40 CFR 63.3890(c)(2). If the facility-specific emission limit is used, then the permittee must include coating activities that meet the applicability criteria of the other subcategories that constitute more than 1% of the total coating activities. Compliance with the facility-specific emission limit and the emission limitations for all surface coating operations can be used for compliance with this and other applicable surface coating NESHAP. **(40 CFR 63.3881(e), 40 CFR 63.3890(c))**

**II. MATERIAL LIMIT(S)**

NA

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

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart M as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3967. **(40 CFR 63.3892(b) and Table 1)**

Add-on Control Device	Operating Limit
Thermal oxidizer	a) The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).
Emission capture system that is a PTE according to 40 CFR 63.3965(a).	a) The direction of the air flow at all times must be into the enclosure; and b) The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.
Emission capture system that is not a PTE according to 40 CFR 63.3965(a).	a) The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device according to 40 CFR 63.3967(f).

2. For any coating operation(s) using the emission rate with add-on controls option, 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/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The work practice plan shall specify practices and procedures to ensure at a minimum the following elements are implemented:

- a) All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers. **(40 CFR 63.3893(b)(1))**
- b) Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized. **(40 CFR 63.3893(b)(2))**
- c) Organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes. **(40 CFR 63.3893(b)(3))**
- d) Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents. **(40 CFR 63.3893(b)(4))**
- e) Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment. **(40 CFR 63.3893(b)(5))**
- f) The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g). **(40 CFR 63.3893(c))**

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g). **(40 CFR 63.3893(c))**

3. If the affected source uses an emission capture system and add-on control device, the permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. 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. **(40 CFR 63.3900(c))**
4. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction. **(40 CFR 63.3900(a)(2)(ii))**
5. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the work practice standards in 40 CFR 63.3893 at all times. **(40 CFR 63.3900(a)(2)(iii))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall not operate FGMMMM unless the RTO is installed, maintained, and operated in a satisfactory manner. **(40 CFR 63.3892(b))**

#### **V. TESTING/SAMPLING**

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

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall conduct each performance test required by 40 CFR 63.3960 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.3964(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h). **(40 CFR 63.3964(a))**
2. The permittee shall conduct each performance test of an emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.3965 and 40 CFR 63.3966. **(40 CFR 63.3964(b))**

#### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12<sup>th</sup> month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months. **(40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960)**
2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931. **(40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j))**
3. The permittee shall maintain, at a minimum, the following records for each compliance period:
  - a) A copy of each notification and report that is submitted to comply with Subpart MMMM, and the documentation supporting each notification and report. **(40 CFR 63.3930(a))**
  - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. **(40 CFR 63.3930(b))**
  - c) A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.3930(c)(1))**
  - d) For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.3930(c)(4)(i) through (v). **(40 CFR 63.3930(c)(4))**
  - e) The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the volume used. **(40 CFR 63.3930(d))**
  - f) The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight. **(40 CFR 63.3930(e))**
  - g) The volume fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.3930(f))**
  - h) For the emission rate with add-on controls option, the density of each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(g))**

- i) The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4). **(40 CFR 63.3930(h))**
  - j) The date, time, and duration of each deviation. **(40 CFR 63.3930(j))**
  - k) For the emission rate with add-on controls option, records specified in 40 CFR 63.3930(k)(1) through 40 CFR 63.3930(k)(8). **(40 CFR 63.3930(k))**
4. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 of 40 CFR Part 63, Subpart Mmmm using the applicable method(s) described below: **(40 CFR 63.3963(c))**

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).	i. Collect the combustion temperature data according to 40 CFR 63.3968(c); ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
Emission capture system that is a PTE according to 40 CFR 63.3965(a).	a. The direction of the air flow at all times must be into the enclosure; and b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.	i. Collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.3968(g)(1); and ii. Maintain the facial velocity of air flow through all natural draft openings at or above the facial velocity limit and maintain the direction of air flow into the enclosure at all times.
Emission capture system that is not a PTE according to 40 CFR 63.3965(a).	a. The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device according to 40 CFR 63.3967(f).	i. Collect the gas volumetric flow rate for each capture device according to 40 CFR 63.3968(g); ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average gas volumetric flow rate for each capture device at or above the gas volumetric flow rate.

- 5. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to the procedures in 40 CFR 63.3961. **(40 CFR 63.3963)**
- 6. During the performance test required by 40 CFR 63.3960, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.3967 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.3892. **(40 CFR 63.3967)**
- 7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.3968(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.3968(b). **(40 CFR 63.3968)**



8. The permittee must apply to the USEPA for approval of alternative monitoring under 40 CFR 63.8(f), if using an add-on control device other than those listed in Table 1 of 40 CFR Part 63, Subpart M, or to monitor an alternative parameter and comply with a different operating limit. **(40 CFR 63.3892(c))**

## **VII. REPORTING**

1. The permittee must submit the following:
  - a) Within 60 days after the date of completing each performance test for emission capture systems and add-on control devices, the results of the performance tests required by 40 CFR Part 63, Subpart M to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). Performance test data must be submitted in the file format generated through use of the USEPA's Electronic Reporting Tool (ERT) (see <http://www.epa.gov/ttn/chief/ert/index.html>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website. For data collected using test methods not listed on the ERT Website, the permittee must submit the results of the performance test to the Administrator at the appropriate address listed in 40 CFR 63.13. **(40 CFR 63.3920(b) and (d))**
  - b) Initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in 40 CFR 63.9(h) and 40 CFR 63.3910(c) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF). The applicable notification must be submitted by the deadline specified in this subpart, regardless of the method in which the reports are submitted. **(40 CFR 63.3920(e))**
  - c) On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for 1-year, whichever date is later, the semiannual compliance report required in 40 CFR 63.3920(a) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year begin submitting all subsequent reports via CEDRI. **(40 CFR 63.3920(f))**
2. The permittee must report the results of performance tests for emission capture systems and add-on control devices within 60 days after the completion of the performance tests. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.2001(5), 40 CFR 63.3920(b))**
3. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7):
  - a) The organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890. **(40 CFR 63.3963(b))**
  - b) An operating parameter is out of the allowed range. **(40 CFR 63.3963(c)(1))**
  - c) Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened. **(40 CFR 63.3963(d))**
  - d) Deviations from work practice standards occur. **(40 CFR 63.3963(e))**
4. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910. **(40 CFR Part 63, Subparts A and M)**

5. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance. **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f))**
6. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for emission capture systems and add-on control devices. **(40 CFR 63.3920(b))**
7. If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit an SSM report as specified in 40 CFR 63.3920(c). **(40 CFR 63.3920(c), 40 CFR 63.10(d))**

#### **VIII. STACK/VENT RESTRICTION(S)**

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 M for Surface Coating of Miscellaneous Metal Parts and Products. **(40 CFR Part 63, Subparts A and M)**

#### **Footnotes:**

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



## 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: E5094	Section Number (if applicable):
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1. Additional Information ID <b>AI-SectionC</b>
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<b>Additional Information</b>
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2. Is This Information Confidential? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
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C4. and C5. The issuance of PTI 49-18A included the installation of new equipment but did not affect the PTE for criteria pollutants or HAPs.

C8. The emission units controlled by the RTO are subject to CAM. The coating lines are also subject to 40 CFR 63, Subpart M (4M) – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. Hutchinson proposes this monitoring can be used to satisfy CAM monitoring (presumptively acceptable monitoring) for VOCs. See attached CAM Plan. Proposing to delete FGCAM as 4M monitoring requirements are presumptively acceptable for CAM.

C9. The malfunction abatement plan for the source is attached.

# Presumptively Acceptable Monitoring/Compliance Assurance Monitoring Plan

## Background

The coating lines described in this Presumptively Acceptable Monitoring/Compliance Assurance Monitoring Plan PAM/CAM Plan are controlled by a regenerative thermal oxidizer (RTO) and are subject to the facility-specific emission limits in 40 CFR 63, Subpart Mmmm – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* (Subpart 4M). The organic hazardous air pollutant (HAP) emission limits listed in Subpart 4M are exempt from CAM requirements. There are monitoring requirements in in FGMACT Mmmm of the facility’s Renewable Operating Permit (ROP) for a thermal oxidizer which will control both HAP and volatile organic compound (VOC) emissions. Hutchinson proposes this monitoring can be used to satisfy PAM/CAM monitoring for VOCs.

## Emission Unit

Description: Three silver spray systems, two Chain-on-Edge Systems, four coating lines all used to apply primer and adhesive to metal and plastic parts.

Identification: FGRT0

Facility: Hutchinson Antivibration Systems, Inc.  
460 Fuller Avenue NE  
Grand Rapids, MI 49503

## Applicable Regulation, Emission Limits, Monitoring Requirements

Permit: MI-ROP-E5094-2018

Emission Limits:

Emission Unit ID	Applicable Emission Limits
EUPR1	VOC 23.6 tpy
EURC1	
EURC2	
EURC3	
EUSIL01	VOC 50.4 tpy
EUSIL02	
EUSIL03	
EUCOE1	
EUCOE2	
EUPR1	
EURC1	
EURC2	
EURC3	

tpy      tons per year

Monitoring Requirements: Continuously monitor combustion chamber temperature.  
Continuously monitor face velocity of the natural draft openings (NDOs)

**Control Technology**

Shared thermal oxidizer.

**Monitoring Approach**

Thermal Oxidizer	
A. Indicator	Combustion chamber temperature is measured continuously using an in-line thermocouple. Temperatures are logged at 15-minute intervals
B. Indicator Range	The indicator range is a minimum temperature of 1,450°F. An <b>excursion</b> is defined as <i>a 3-hour block average temperature less than the required minimum</i> . Excursions trigger corrective actions, logging, and reporting in a semiannual report.
C. QIP Threshold	N/A

Exhaust Flow Rate for Non-PTEs (Non-Permanent Total Enclosures)	
A. Indicator	The volumetric flow rate is measured continuously.
B. Indicator Range	The indicator range is the average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet which in any 3-hour block must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f) for non-PTE enclosures.
C. QIP Threshold	N/A

Face Velocity for PTEs	
A. Indicator	The volumetric flow rate is measured continuously.
B. Indicator Range	The indicator range is an average facial velocity of air through all natural draft openings in the enclosure which must be at least 200 feet per minute in any 3-hour block. An <b>excursion</b> is defined as <i>a facial velocity less than 200 feet per minute average over any 3-hour block while equipment is in operation</i> . Short-term excursions trigger interlocks which shut down operation of the machine after 5 minutes of readings less than the required minimum. If an excursion occurs, corrective actions, logging, and reporting are required in a semiannual report.
C. QIP Threshold	N/A

**Performance Criteria**

Monitoring the temperature and pressure drop will meet the performance criteria described in FGMACT MMMM.

**Justification**

In accordance with the Michigan Department of Environment, Great Lakes, and Energy (EGLE) CAM Fact Sheet, justification for use of the presumptively acceptable monitoring from 4M is not required.

**HAVS GRAND RAPIDS ENVIRONMENTAL POLICY**

<b>Subject:</b> RTO Alarms / Shutdown, Start-up & Malfunction Policy	<b>Policy Number &amp; Revision Level:</b> GEPL 158.14	<b>Page:</b> 1 of 10
<b>Owned by:</b> Kaitlyn Laug	<b>Approved by:</b>	

**1.0 PURPOSE**

- 1.1 The purpose of the MAP (Malfunction Abatement Plan/Preventive Maintenance Program) is to provide a complete preventative maintenance program, operating variables and corrective actions for each source and air cleaning device listed in MI-ROP-E5094-2018. The MAP consists of two parts:
  - 1.1.1 The preventive maintenance program and
  - 1.1.2 The malfunction abatement and equipment monitoring program.
- 1.2 The purpose of the SSMP (Startup, Shutdown and Malfunction Plan) is to address the startup, shutdown, and corrective actions in the event of a malfunction of any PeTE, non-PeTE or the RTO that would cause the emission unit(s) to exceed the applicable NESHAP emission limit. The plan 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. The MAP, described above, covers the malfunction portion of the SSMP.
- 1.3 The purpose of the WPP (Work Practices Plan) is to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by coating operations. The WPP consists of general operational controls and housekeeping measures for management of materials containing VOC and/or HAP.

**2.0 SCOPE**

This procedure is applicable to the operation of all sources and emission units listed in MI-ROP-E5094-2018 located at 460 Fuller Ave. NE Grand Rapids MI 49503

**3.0 RESPONSIBILITY**

Application of, and adherence to, this procedure is the responsibility of all HAVS employees and contractors operating, maintaining, or supervising equipment listed as control measures or emission sources in MI-ROP-E5094-2018 .

**4.0 DEFINITIONS**

HAP: Hazardous Air Pollutants

HAVS: The authorized acronym for Hutchinson Antivibration Systems, Inc., the Automotive Anti-Vibration and Noise Reduction Systems division of [Hutchinson North America](#) (HNA).

MAP: Malfunction Abatement Plan/Preventive Maintenance Program; The MAP describes the methods by which anticipated malfunctions will be managed by the facility.

PeTE: Permanent Total Enclosure: a surrounding structure that allows all VOC emissions to be directed to the exhaust. Capture is listed as 100%

**Non-PeTE:** Non-Permanent Total Enclosure: a surrounding structure that allows all VOC emissions to be directed to the exhaust. Capture is determined by a Capture Efficiency Test.

**ROP:** Renewable Operating Permit; The ROP is issued by the Michigan Department of Environmental Quality and provides the facility’s authority to operate the VOC / HAP source(s) in accordance with the conditions and requirements as outlined in the permit.

**RTO:** Regenerative Thermal Oxidizer

**SSMP:** Startup, Shutdown, Malfunction Plan; The SSMP describes the methodology by which the RTO system is started from a “cold” state to full treatment operation and shutdown from operational status to full cold shutdown.

**VOC:** Volatile Organic Compounds

**WPP:** Work Practices Plan; The WPP describes methods and activities which fugitive emissions of VOC and HAP are minimized during typical operations.

**CPMS:** Continuous Parameter Monitoring System: an integrated monitoring system that monitors and collects data from the coating operations

## 5.0 PROCEDURE

### 5.1 MAP - Preventive Maintenance Program

This program is designed to minimize equipment malfunctions by establishing a preventive maintenance schedule for all equipment and accessories associated with the air pollution control systems. The following table lists the items to be inspected, the frequency of inspections, responsibility for inspection, and replacement parts kept in inventory. During inspections the following information will be recorded:

**Preventive Maintenance Program**

Unit	Item inspected	Frequency	Responsibility	Replacement Parts
EURTO	Inspect RTO for any signs of damage.	Weekly	Maintenance	
	Inspect hydraulic hoses/lines for leaks.	Weekly	Maintenance	Hose/fittings/valves
	Inspect hydraulic pump/tank for level and leaks.	Weekly	Maintenance	Pump
	Inspect hydraulic cylinders for leaks.	Weekly	Maintenance	Cylinders
	Inspect poppet valve switches for tightness.	Weekly	Maintenance	Switches and cables
	Inspect primary filters.	Weekly	Maintenance	Filters
	Grease fan shaft bearings.	Weekly	Maintenance	Grease / Bearings
	Remove and clean air filters on cabinet and VFD	Weekly	Maintenance	
	Replace primary filters	As indicated	Maintenance	Filters
	Grease fresh air damper linkages.	Monthly	Maintenance	Linkage
	Grease gas valve fittings.	Monthly	Maintenance	Gas valve
	Grease low fire cam.	Monthly	Maintenance	
	Clean TSI flow meter probe	Monthly	Maintenance	
	Remove and clean draft fan filter	Monthly	Maintenance	Filter
	Verify accuracy of chamber thermocouples.	Monthly	Maintenance	Thermocouples
	Inspect wiring, connections, and relays	Semi-annual	Maintenance	Switches and relays
	Inspect ceramic media	Annual	Maintenance	
	Inspect poppet valves	Annual	Maintenance	
Inspect gas train, burner, and burner control	Annual	Maintenance	Burner control	
Inspect UV Scanners	Annual	Maintenance	UV Scanner	
Inspect Thermocouples	Annual	Maintenance	Thermocouples	

**HAVS GRAND RAPIDS ENVIRONMENTAL POLICY**

<b>Policy Number &amp; Revision: GEPL 158.14</b>	<b>Subject: RTO Alarms / Shutdown &amp; Start-up</b>	<b>Page: 3 of 10</b>
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Unit	Item inspected	Frequency	Responsibility	Replacement Parts
EURTO	Monitor Average Combustion Temperature. Alarm if temperature drops below operational limit of 1475°F.	Continuous	Tridium system	Hayworth temperature sensor
EUSIL1	Monitor airflow in booth exhaust duct. Alarm/shutdown if airflow direction is not toward RTO; alarm if stack airflow drops below 3229 CFM for longer than 5 minutes.	Continuous	Tridium system	Veris PX transmitter
	Verify accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage.	Monthly	Technician	
	Check paint pots and associated piping for fugitive VOC emissions using olfactory/PID meter	Weekly	Technician	
EUSIL2	Monitor airflow in booth exhaust duct. Alarm/shutdown if airflow direction is not toward RTO; alarm if face velocity drops below 200 FPM (equal to airflow drop below 236 CFM) for longer than 5 minutes.	Continuous	Tridium system	Veris PX transmitter
	Verify accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage.	Monthly	Technician	
	Check paint pots and associated piping for fugitive VOC emissions using olfactory/PID meter	Weekly	Technician	
EUSIL3	Monitor airflow in booth exhaust duct. Alarm/shutdown if airflow direction is not toward RTO; alarm if face velocity drops below 200 FPM (equal to airflow drop below 554 CFM) for longer than 5 minutes.	Continuous	Tridium system	Veris PX transmitter
	Verify accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage.	Monthly	Technician	
	Check paint pots and associated piping for fugitive VOC emissions using olfactory/PID meter	Weekly	Technician	
EUCOE	Monitor airflow in booth exhaust duct. Alarm/shutdown if airflow direction is not toward RTO; alarm if face velocity drops below 200 FPM (equal to airflow drop below 296 CFM) for longer than 5 minutes.		Tridium system	Veris PX transmitter
	Verify accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage.	Monthly	Technician	
	Check paint pots and associated piping for fugitive VOC emissions using olfactory/PID meter	Weekly	Technician	
EUADHESIVE1 (PR1)	Monitor airflow in booth exhaust duct. Alarm/shutdown if airflow direction is not toward RTO; alarm if face velocity drops below 200 FPM (equal to airflow drop below 175 CFM) for longer than 5 minutes.	Continuous	Tridium system	Veris PX transmitter
	Verify accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage.	Monthly	Technician	
	Check paint pots and associated piping for fugitive VOC emissions using olfactory/PID meter	Weekly	Technician	
EUADHESIVE2 (RC1)	Monitor airflow in booth exhaust duct. Alarm/shutdown if airflow direction is not toward RTO; alarm if face velocity drops below 200 FPM (equal to airflow drop below 175 CFM) for longer than 5 minutes.	Continuous	Tridium system	Veris PX transmitter
	Verify accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage.	Monthly	Technician	



Unit	Item inspected	Frequency	Responsibility	Replacement Parts
EUADHESIVE2 (RC1)	Check paint pots and associated piping for fugitive VOC emissions using olfactory/PID meter	Weekly	Technician	
EUADHESIVE3 (RC2)	Monitor airflow in booth exhaust duct. Alarm/shutdown if airflow direction is not toward RTO; alarm if face velocity drops below 200 FPM (equal to airflow drop below 175 CFM) for longer than 5 minutes.	Continuous	Tridium system	Veris PX transmitter
	Verify accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage.	Monthly	Technician	
	Check paint pots and associated piping for fugitive VOC emissions using olfactory/PID meter	Weekly	Technician	
EUADHESIVE4 (RC3)	Monitor airflow in booth exhaust duct. Alarm/shutdown if airflow direction is not toward RTO; alarm if face velocity drops below 200 FPM (equal to airflow drop below 175 CFM) for longer than 5 minutes.	Continuous	Tridium system	Veris PX transmitter
	Verify accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage.	Monthly	Technician	
	Check paint pots and associated piping for fugitive VOC emissions using olfactory/PID meter	Weekly	Technician	

## 5.2 MAP - Malfunction Abatement and Equipment Monitoring Program

This program is intended to identify any abnormal conditions or malfunctions associated with the air pollution control systems. The following table lists the equipment that could cause the emission limits to be exceeded in the event of a malfunction, the monitored operating conditions, and the corrective actions to be taken to achieve compliance during a malfunction of the equipment.

### Malfunction Abatement and Equipment Monitoring Program

Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
RTO	Temperature	Minimum 1475°F (3 hour average)	Continuous	<p>Do not operate the coating processes unless the RTO is within the proper operating range. .</p> <p>In the event of an RTO system fault, the system will shut down and sound an alarm. The RTO temperature fault will automatically shut down cementing operations.</p> <p>The fault should be examined to determine the cause of the out of range reading and a repair determined. After the problem has been fixed, the RTO system must be restarted as per the SSMP to return the unit to operation before coating operations can resume.</p>

**HAVS GRAND RAPIDS ENVIRONMENTAL POLICY**

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Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
Non-PeTE for EUSIL1	Stack CFM	CFM greater than 3229  (CPMS trigger: 3280 CFM)	Continuous	Do not operate the coating process required to be inside the non-permanent total enclosure unless the exhaust CFM is above the operating limit noted.
				If the CFM minimum alarm is activated, the CPMS system will automatically shut down cementing operations for Silver 1. Maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the cause will identified and repaired. The transducer will be verified and the system restarted.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL2	Airflow direction  Face Velocity	Toward RTO (into booth) CFM greater than 236 (equivalent to 200 FPM at NDO's)  (CPMS trigger: 250 CFM)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless the face velocity is above the operating limit noted.
				If the face velocity minimum alarm is activated, the CPMS system will automatically shut down cementing operations for Silver 2. Maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the cause will identified and repaired. The transducer will be verified and the system restarted.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL3	Airflow direction  Stack CFM	Toward RTO (into booth) CFM greater than 554 (equivalent to 200 FPM at NDO's)  (CPMS trigger: 580 CFM)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
				If the face velocity minimum alarm is activated, the CPMS system will automatically shut down cementing operations for Silver 3. Maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the cause will identified and repaired. The transducer will be verified and the system restarted.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.

**HAVS GRAND RAPIDS ENVIRONMENTAL POLICY**

Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
PeTE for EUCOE	Airflow direction  Stack CFM	Toward RTO (into booth) CFM greater than 296 (equivalent to 200 FPM at NDO's)  (CPMS trigger: 310 CFM)	Continuous	<p>Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).</p> <p>If the face velocity minimum alarm is activated, the CPMS system will automatically shut down cementing operations for the COE. Maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the cause will be identified and repaired. The transducer will be verified and the system restarted.</p> <p>In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.</p>
PeTE for EUADHESIVE1 (PR1)	Airflow direction  Stack CFM	Toward RTO (into booth) CFM greater than 175 (equivalent to 200 FPM at NDO's)  (CPMS trigger: 200 CFM)	Continuous	<p>Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).</p> <p>If the face velocity minimum alarm is activated, the CPMS system will automatically shut down cementing operations for PR1. Maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the cause will be identified and repaired. The transducer will be verified and the system restarted.</p> <p>In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.</p>
PeTE for EUADHESIVE2 (RC1)	Airflow direction  Stack CFM	Toward RTO (into booth) CFM greater than 175 (equivalent to 200 FPM at NDO's)  (CPMS trigger: 200 CFM)	Continuous	<p>Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).</p> <p>If the face velocity minimum alarm is activated, the CPMS system will automatically shut down cementing operations for RC1. Maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the cause will be identified and repaired. The transducer will be verified and the system restarted.</p> <p>In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.</p>

Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
PeTE for EUADHESIVE3 (RC2)	Airflow direction  Stack CFM	Toward RTO (into booth) CFM greater than 175 (equivalent to 200 FPM at NDO's)  (CPMS trigger: 200 CFM)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
				If the face velocity minimum alarm is activated, the CPMS system will automatically shut down cementing operations for R. Maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the cause will be identified and repaired. The transducer will be verified and the system restarted.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUADHESIVE4 (RC3)	Airflow direction  Stack CFM	Toward RTO (into booth) CFM greater than 175 (equivalent to 200 FPM at NDO's)  (CPMS trigger: 200 CFM)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).
				If the face velocity minimum alarm is activated, the CPMS system will automatically shut down cementing operations for the AMS. Maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the cause will be identified and repaired. The transducer will be verified and the system restarted.
				In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.

### 5.3 Startup, Shutdown, Malfunction Plan (SSMP)

The SSMP is intended to minimize emissions during startup, shutdown, and malfunctions of the emission control systems. The MAP, discussed above, covers the procedures and actions to minimize emissions during malfunctions.

5.3.1 In general, the RTO is not shutdown to a “cold” state, but instead put into “Standby Mode” during weekends or holidays when coating operations are suspended. Standby Mode allows the RTO to be quickly brought back to operational status prior to the resumption of coating operations.

5.3.2 If it becomes necessary to fully shutdown the RTO system, all coating operations will be stopped as quickly as possible. The facility will follow the RTO manufacturer’s recommendations and procedures to facilitate the shutdown in a safe and efficient manner, while minimizing any fugitive emissions from the halted coating operations. The PeTE and non-PeTE systems will be left intact and closed to minimize residual emissions until the total shutdown of the RTO has been completed.

5.3.3 During the startup of the RTO system from a “cold” state, the facility will follow the RTO manufacturer’s recommendations and procedures for the automated control sequence startup of the system. The system is started in standby mode and switched to oxidize mode when the minimum combustion temperature of 1475°F is attained. Coating operations will only commence when both the RTO, PeTE and non-PeTE operations and conditions are confirmed.

5.3.4 The RTO is equipped with Four (4) alarm systems as follows:

#### 5.4 CPMS System

5.4.1 The temperature in the RTO burn chamber is monitored and will alarm with a red flashing light, mounted on the control panel, and yellow flashing lights at the silver spray booths anytime the temperature inside the RTO is below 1475°F. This temperature is also being recorded on a digital recorder. The thermocouples in the chamber will be checked and verified for accuracy monthly.

**Action:** anytime this alarm is activated, the cementing operations that are connected to the RTO are automatically shut down. Maintenance should then be notified and the temperature corrected and verified.

5.4.1 The air flow or SCFM to the RTO is also being monitored and supplies a digital readout and is monitored by the CPMS.-When the SCFM exceeds 9500, or drops below 600, the red flashing light on top of the control panel will activate, and the CPMS will automatically shut down the paint booths. This SCFM monitor must be verified every 3 months as to its accuracy.

5.4.2 The CPMS monitors individual paint booth airflow volume (SCFM), direction and intake air velocity (based on Method 204 testing) at each machine and will alarm with a red light at the CPMS panel if the SCFM drops below 3229 CFM on SILV01; a non-PeTE machine, or the airflow direction is not toward the RTO (negative); or the face velocity at any NDO is below 200 FPM velocity on the PeTE machines.

The CFM readings for 200 FPM are as follows:

5.4.2.1	Silver 2	236 CFM
5.4.2.2	Silver 3	554 CFM
5.4.2.3	COE	296 CFM
5.4.2.4	PR1	175 CFM
5.4.2.5	RC1	175 CFM
5.4.2.6	RC2	175 CFM
5.4.2.7	RC3	175 CFM

**Action:** anytime these alarms are activated the cementing operations are automatically shut down. Maintenance should then be notified and the air flow is corrected.

- 5.4.3 Cementing operations will also lock out if the RTO or CPMS unit loses power or does not come back on after an electrical power outage. All cementing sources are tied back into the RTO and CPMS. Interlocks on each source will prevent machine startups until power is restored to the RTO and/or CPMS unit.

**HAVS GRAND RAPIDS ENVIRONMENTAL POLICY**

<b>Policy Number &amp; Revision: GEPL 158.14</b>	<b>Subject: RTO Alarms / Shutdown &amp; Start-up</b>	<b>Page: 9 of 10</b>
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**NOTE:** The CPMS records the status of the RTO “command” value (permission to run based on temperature) as well as the individual machine “command” values and the CPMS status.

5.5 Work Practices Plan (**WPP**)

The WPP is intended to minimize fugitive emissions of VOC and HAP during typical facility operation. The following elements are implemented under the WPP:

- 5.5.1 All VOC and HAP containing coatings, thinners, additives, cleaning materials, and waste materials are stored in covered containers when not in use.
- 5.5.2 Spills of VOC and HAP containing coatings, thinners, additives, cleaning materials, and waste materials are minimized by personnel training and implementation of procedures. Any spills that occur are cleaned up as quickly as possible, and any rags or absorbents used during the spill cleanup are placed into closed containers prior to proper disposal.
- 5.5.3 VOC and HAP containing coatings, thinners, additives, cleaning materials, and waste materials are conveyed from one location to another in closed containers or piping.
- 5.5.4 Mixing vessels which contain VOC or HAP containing coatings, thinners, additives, cleaning materials, and waste materials are kept closed except when adding, removing, or mixing the contents.
- 5.5.5 All spent filters are disposed of in a manner which minimizes the introduction of VOC and HAP emissions.
- 5.5.6 Emissions of VOC and HAP are minimized during the cleaning of storage, mixing, and conveying equipment by limiting the duration of exposure, training of personnel, and by minimizing solvent usage during these activities. Any rags or absorbents used during cleaning activities are placed into closed containers prior to proper disposal

5.6 Malfunction Abatement Contingency Plan

**Malfunction Abatement Contingency Plan**

<b>Condition</b>	<b>Decision</b>	<b>Response</b>	<b>Condition to Response</b>	<b>Action</b>
1. Malfunction discovered.	Can floor personnel repair the malfunction?	Yes	Repairs can be completed within 1 hour.	Complete repairs. Notify supervisor. Review PM/MAP for updates if necessary.
			Repairs cannot be completed within 1 hour.	Inform supervisor and maintenance of the malfunction immediately. Proceed to condition #2.
		No		Inform supervisor and maintenance of the malfunction immediately. Proceed to condition #2.

2. Maintenance informed of malfunction.	Can maintenance repair the malfunction?	Yes	Repairs can be completed in within 1 hour	Complete repairs. Notify supervisor. Review PM/MAP for updates if necessary.
			Repairs cannot be completed within 1 hour.	Inform management of the malfunction immediately. Proceed to condition #3.
	No		Inform management of the malfunction immediately. Proceed to condition #3.	

**HAVS GRAND RAPIDS ENVIRONMENTAL POLICY**

<b>Policy Number &amp; Revision: GEPL 158.14</b>	<b>Subject: RTO Alarms / Shutdown &amp; Start-up</b>	<b>Page: 10 of 10</b>
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Condition	Decision	Response	Condition to Response	Action
3. Management informed of malfunction.  <b>Estimate the malfunctions effect on capture/destruction of HAP and VOC.</b>	Is the malfunction likely to result in emissions that will exceed permit limits?	Yes	Repairs will exceed 2 hours.	Management must take immediate action to minimize the potential to exceed permit emission limits. Proceed to condition #4.
			Repairs will be <2 hours, but > 1 hour.	Management must take immediate action to minimize the potential to exceed permit emission limits. Proceed to condition #4.
			Repairs can be completed within 1 hour.	Proceed with repairs. Monitor time to complete repairs. If repair time > 1 hour, proceed to condition #4.
		No		Proceed with repairs. Monitor emission estimates. If emission estimates exceed permit limits, proceed to condition #4.
4. Reduction of potential to exceed permit emission limits.  <b>Management must take corrective measures to ensure that emission levels do not exceed permit conditions:</b>  <b>a) Reduce production.</b> <b>b) Stop Production.</b>		Yes	Emission limits were exceeded for > 2 hours.	Notify MDEQ-AQD of the malfunction within 48 hours. Provide written report to the MDEQ-AQD within 10 days of the occurrence. Review PM/MAP program to prevent any reoccurrence of the malfunction.
			Emission limits were exceeded for < 2 hours, but > 1 hour.	Notify MDEQ-AQD of the malfunction within 48 hours. Review PM/MAP program to prevent any reoccurrence of the malfunction.
			Emission limits were exceeded for < 1 hour.	Review PM/MAP program to prevent any reoccurrence of the malfunction.
		No		Review PM/MAP program to prevent any reoccurrence of the malfunction.

## 6.0 RECORD RETENTION

Completed copies of all records will be retained for 5 years.

## 7.0 DISTRIBUTION

[HAVS Intranet](#) Access  
H.R. Master File – Grand Rapids

## 8.0 ATTACHMENTS

None.

**POLICY REVISIONS (Page 1 of 2)**

Policy No.	Rev. No.	By	Date	Description of Revision
GR 58	.00	Roger Bates	01-Mar-98	RTO malfunction / original
		Roger Bates	01-Nov-99	Reviewed / no changes
GR 58	.01	Richard Foerster	01-Apr-03	Added, scheduled verification of thermocouples/gauges
GR 58	.02	Chuck Klein	01-Jul-07	Updated equipment numbers and types on system
GRPOL 58	.03	Richard Foerster Tony Wolfram	05-Jun-09	Entire Document – remove reference to Lambda cells, formatted to current standard Header – changed “Written By: Roger Bates” to “Owned By: Rich Foerster”
GRPOL 58	.04	Richard Foerster	18-May-11	Entire Document – removed references to Silver 3
GRPOL 158	.05	Tony Wolfram Richard Foerster	12-Dec-11	Entire Document – changed from GRPOL 58 to GRPOL 158 due to database limitations, removed references to specific pieces of equipment, uploaded to PPD_HR_CRC Database 1.0 – remove – operation of” 3.0, 4.0, 6.0 & 8.0 – added (Responsibility, Definitions, Record Retention & Attachments) 5.1 – changed “Two (2)” to “Three (3)” 5.1.1 – changed “100” to “50” added “recorder” & “in the chamber” & removed “gauges” 5.1.2 – added “on the circular charts.”, changed “6800” to “9950”, added “or drops below 600”, & changed “6” to “3” 5.1.3 – added (lockout of cement machines if RTO loses power) 5.2.2 – added “M” to “DEQ”
GRPOL 158	.06	Richard Foerster Tony Wolfram	01-Mar-12	3.0 & 5.2.1 & 6.0 – change “EMS Site” to “HSE” 4.0 – added HSE definition 5.2.2 – changed “anytime” to “Before” and “within 2 business days of beginning of malfunction” to “immediately”
GEPOL 158	.07	Jim Niesen	30-Dec-14	Header – changed “Rich Foerster” to “Jim Niesen” 2.0 – changed from Paulstra CRC to HAVS
GEPOL 158	.08	Jim Niesen	10-Oct-15	4.0 – added definitions for: HAVS, °F and CPMS, “H <sub>2</sub> O and CFM 5.1.1 – changed “outside 1550 degrees (±50 degrees)” to “below 1550°F”, changed “must be” to “are automatically” 5.1.2. – changed from “9950” to “9500”, changed “must be” to “are automatically” 5.1.3 – Add references to the CPMS system. 5.1.4 – Add references to the CPMS system. 5.2 – Add CPMS system.
GEPOL 158	.09	Jim Niesen	10-Mar-16	Reformat to CEP 900 base with CPMS specifics from GR
GEPOL 158	.10	Jim Niesen	22-Jul-16	Add CPMS data from DE/CE test of 7/21/16 (airflow on SIL01 as it is a non PeTE
GEPOL 158	.10	Jim Niesen	27-Mar-17	Correct RTO temperature: missed during last update
GEPOL 158	.11	Jim Niesen	15-July-17	-Update for FPM monitoring of PeTE booth instead of pressure drop - add details for CPMS alarm/shutdown functions
GEPOL 158	.12	Jim Niesen	19-Jan-18	- clarify details for CPMS alarm/shutdown functions (5.2, 5.4) - Clarify monthly chamber temperature checks
GEPOL 158	.13	Fishbeck	20-Oct-19	Updated ROP number. Updated minimum RTO temperature from 1577°F to 1475°F (5.1, 5.2, 5.3.3, and 5.4.1) Updated minimum Silver1 flow rate form 2369 CFM to 3229 CFM (5.1, 5.2, and 5.4.2)







## 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: E5094	Section Number (if applicable):
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1. Additional Information ID <b>AI-RICE</b>
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<b>Additional Information</b>
-------------------------------

2. Is This Information Confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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EU-Generator is a 70 HP Natural Gas spark ignition (SI) reciprocating internal combustion engine (RICE) used for emergency purposes; which was installed around May 2007. Due to the installation date, the SI RICE is considered a new stationary source for the purposes of the RICE NESHAP (40 CFR Part 63 Subpart ZZZZ). As a new source, the source is considered to be in compliance with the RICE NESHAP by being in compliance with the SI ICE NSPS (40 CFR Part 60 Subpart JJJJ). Pursuant to 60.4230(a)(4)(iv), only emergency engines installed after 6/12/2006 which are manufactured after 1/1/2009, are subject to the NSPS. Therefore there are no applicable requirements for the EU-Generator, except operating as an emergency engine.

Since there are no applicable requirements for the emergency engines, a RICE MACT flexible group has not been created, and emissions from the emergency engine are not included in the ROP renewal application.

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

EFFECTIVE DATE: October 21, 2018

ISSUED TO

**Hutchinson Antivibration Systems, Inc.**

State Registration Number (SRN): E5094

LOCATED AT:

460 Fuller Avenue NE, Grand Rapids, Michigan 49503

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-E5094-2018

Expiration Date: October 21, 2023

Administratively Complete ROP Renewal Application  
Due Between April 21, 2022 and April 21, 2023

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-E5094-2018

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 Environmental Quality

Heidi Hollenbach, Grand Rapids District Supervisor

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## 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 Environmental Quality (MDEQ) 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 is 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.

~~This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order AQD No. 25-2016, entered on August 22, 2016 between the MDEQ and the permittee.~~

## 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))**

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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).<sup>2</sup> **(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:"<sup>2</sup> **(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.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(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).<sup>2</sup> **(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))**

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### 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.



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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))**
- 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.
  - 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.<sup>2</sup> **(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))**
- The applicable requirements are included and are specifically identified in the ROP.
  - 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:
- 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))**
  - 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))**
  - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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- 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))**

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## 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):
- June 21, 1999,
  - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
  - 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))**

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#### 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.<sup>2</sup> **(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.<sup>2</sup> **(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, MDEQ.<sup>2</sup> **(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, MDEQ, 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.<sup>2</sup> **(R 336.1201(4))**

#### **Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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## **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.

## SOURCE-WIDE CONDITIONS

### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

NA

#### II. MATERIAL LIMIT(S)

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)

NA

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**IX. OTHER REQUIREMENT(S)**

- ~~1. The conditions contained in this ROP for which a Consent Order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Order. The effective date of termination is defined for the purposes of this condition as the date upon which the Termination Order is signed by the Director of the AQD.~~

**Footnotes:**

- <sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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### 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
EUCARBON	Carbon black transport system. Gravity feed of carbon from truck to hopper. Pneumatic transfer of carbon from hopper to four (4) silos, with baghouse filters.	05/01/1988, 06/30/1988	NA
EUMIX	Four rubber mills and one mixer, all venting to one external baghouse.	03/01/1988, 05/01/1988, 12/21/2016	NA
EUWHEEL	Wheelabrator Tumbast, controlled by an externally venting Wheelabrator dust collector.	06/01/1979	NA
EURUBBERMIX2	Rubber mixer controlled by externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.	02/20/2006	FGRULE290
EU002CLEAN	Six small wash stations for cleaning parts.	01/01/1980, 01/01/1981	FGCOLDCLEANERS
EUSIL01	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1988, 05/12/2015	FGRTO FGMMMM FGCAM
EUSIL02	A turbo spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1989, 05/12/2015	FGRTO FGMMMM FGCAM



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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSIL03	A spray system used for applying cement to metal and plastic parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.	1989, 05/12/2015	FGRTO FGMMMM FGCAM
EUSIL04	<del>A spray system used for applying cement to metal and plastic parts. The system consists of a steam heated tunnel, a primer application booth, a topcoat application booth and a steam heated drying tunnel. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.</del>	<del>10/01/1991, 05/12/2015</del>	<del>FGRTO FGMMMM FGCAM</del>
EUCOE01	Chain-on-edge number 1 is two (2) automated spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the robot-mounted spray guns. VOC emissions from this line are controlled by a common regenerative thermal oxidizer.	08/26/2013, 05/12/2015	FGRTO FGMMMM FGCAM
EUCOE02	<del>Chain-on-edge number 2 is two (2) automated spray booths for applying cement to metal and plastic parts. Prior to entering the booths, the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through the robot-mounted spray guns. VOC emissions from this line are controlled by a common regenerative thermal oxidizer. This emission unit is considered a PTE.</del>	<del>TBD</del>	<del>FGRTO FGMMMM</del>
EUAMS02	<del>A spray system used for applying cement to rubber parts for plastic overmolding. The system consists of an electrical preheater and two (2) topcoat application booths. Automated robot transfer of the parts from the preheat to the booths. VOC emissions from the system are controlled by a common regenerative thermal oxidizer.</del>	<del>12/08/2015</del>	<del>FGRTO FGMMMM FGCAM</del>
<del>EUADHESIVE1 EUPR1</del>	<del>An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.</del>	<del>TBD</del>	<del>FGRTO FGMMMM FGCAM</del>
<del>EUADHESIVE2 EURC1</del>	<del>An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.</del>	<del>TBD</del>	<del>FGRTO FGMMMM FGCAM</del>
<del>EUADHESIVE3 EURC2</del>	<del>An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.</del>	<del>TBD</del>	<del>FGRTO FGMMMM FGCAM</del>
<del>EUADHESIVE4 EURC3</del>	<del>An adhesive coating line used to apply adhesive to both metal and plastic parts. Emissions will be controlled by an RTO.</del>	<del>TBD</del>	<del>FGRTO FGMMMM FGCAM</del>

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBOILER2	Natural gas fired boiler for building heat; 26.0 MMBtu/hr	01/01/1956	FGDDDDD
EUBOILER4	Natural gas fired boiler for building heat; 12.55 MMBtu/hr	01/22/2018	FGDDDDD

**EUCARBON  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Carbon black transport system; gravity feed of carbon from truck to hopper. Pneumatic transfer of carbon from hopper to four (4) silos with baghouse filters.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Baghouse filters

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 lbs. per 1,000 lbs. of exhaust gases, corrected to 50% excess air <sup>2</sup>	Hourly	EUCARBON	GC 13 SC VI.1, VI.2	<b>R 336.1331(1)(a), Table 31, item J</b>

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall not operate the equipment unless the baghouses are installed and operating properly. (R 336.1910)

**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))

1. The permittee shall conduct and record quarterly maintenance checks of equipment. (R 336.1213(3))
2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUCARBON is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include

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the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions. **(R 336.1213(3))**

3. The permittee shall monitor and record the pressure drop across the baghouses at least once per operating day. **(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)**

1. The permittee shall not operate EUCARBON unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor. **(R 336.1213(3))**

#### **Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUMIX  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Four rubber mills and one mixer, all venting to one external baghouse.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Fabric filter (baghouse)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	1.44 pounds per hour <sup>2</sup>	monthly average which is calculated using the actual operating hours for that month	EUMIX	GC 13 SC VI.1, VI.3	<b>R 336.1331(1)(c)</b>
2. Particulate	6.29 tons per year <sup>2</sup>	based on a 12-month rolling time period as determined at the end of each calendar month	EUMIX	GC 13 SC VI.1, VI.3	<b>R 336.1331(1)(c)</b>
3. Particulate	0.01 pounds per 1,000 pounds of exhaust gases calculated on a dry gas basis <sup>2</sup>	Hourly	EUMIX	GC 13 SC VI.1, VI.3	<b>R 336.1331(1)(c)</b>
4. Opacity	5% <sup>2</sup>	6-minute average	EUMIX	SC VI.2	<b>R 336.1301(c)</b>

**II. MATERIAL LIMIT(S)**

NA

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

- The permittee shall not operate the equipment unless the baghouse is installed and operating properly.<sup>2</sup> (**R 336.1910**)

**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

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**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 conduct and record quarterly maintenance checks of equipment.<sup>2</sup> (R 336.1301, R 336.1331)
2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUMIX is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions.<sup>2</sup> (R 336.1301)
3. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the baghouse at least once per operating day. (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)**

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. SV-PULSEJET	43 <sup>2</sup>	33 <sup>2</sup>	R 336.1201(3)

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall not operate EUMIX unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor.<sup>2</sup> (R 336.1301, R 336.1331, R 336.1911)

**Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUWHEEL  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Wheelabrator Tumblast (shot blast machine)

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Externally venting Wheelabrator baghouse

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.10 pound per 1,000 pounds of exhaust gases calculated on a dry gas basis <sup>2</sup>	Hourly	EUWHEEL	GC 13 SC VI.1, VI.2	<b>R 336.1331(1)(a), Table 31, item J</b>

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall not operate the tumblast operation unless the baghouse is installed and operating properly.<sup>2</sup>  
(R 336.1910, R 336.1201)

**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))

1. The permittee shall conduct and record quarterly maintenance checks of equipment. (R 336.1213(3))
2. The permittee shall conduct weekly non-certified visible emissions checks, during daylight hours when EUWHEEL is in full operation, and shall take appropriate action immediately to remedy the cause of any observed visible emissions. The permittee shall keep a record of these visible emissions checks which include the date, time, results, person conducting the observations, and any action taken in response to observed visible emissions. (R 336.1213(3))

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3. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the baghouse at least once per operating day. **(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)**

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. SV-WHEEL	15 <sup>2</sup>	26 <sup>2</sup>	<b>R 336.1201(3)</b>

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall not operate EUWHEEL unless a preventative maintenance plan has been implemented and is maintained, in a format approved by the AQD District Supervisor. **(R 336.1213)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).



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### 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
FGRTO	<del>Two</del> An automated chain-on-edge spray lines, <del>four-three</del> (43) Silver spray lines, and <del>an overmolding spray system</del> <u>four adhesive coating lines</u> all used to coat metal and plastic parts. The VOC emissions from these <del>six</del> <u>nine</u> (9) lines are controlled by a common regenerative thermal oxidizer.	EUSIL01, EUSIL02, EUSIL03, <del>EUSIL04</del> , EUCOE01, <del>EUCOE02</del> , <u>EUPR1</u> , <u>EURC1</u> , <u>EURC2</u> , <u>EURC3</u> , <u>EUAMS02</u> <u>EUADHESIVE1</u> , <u>EUADHESIVE2</u> , <u>EUADHESIVE3</u> , <u>EUADHESIVE4</u>
FGMMM	Each affected source subject to 40 CFR Part 63, Subpart MMMM for the surface coating of miscellaneous metal parts and products.	EUSIL01, EUSIL02, EUSIL03, <del>EUSIL04</del> , EUCOE01, <del>EUCOE02</del> , <u>EUPR1</u> , <u>EURC1</u> , <u>EURC2</u> , <u>EURC3</u> , <u>EUAMS02</u> <u>EUADHESIVE1</u> , <u>EUADHESIVE2</u> , <u>EUADHESIVE3</u> , <u>EUADHESIVE4</u>
FGCAM	<del>40 CFR Part 64, Compliance Assurance Monitoring (CAM) requirements for the pollutant-specific emission unit (defined as FGRTO) that has potential pre-control emissions over 100 percent of the major source threshold.</del>	<del>EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4, (FGRTO)</del>
FGDDDD	Applicable requirements that would apply to affected boilers as described in 40 CFR Part 63, Subpart DDDDD.	EUBOILER2, EUBOILER4
FGRULE290	Rubber mixer controlled by externally vented dust collector with an exhaust flow rate of approximately 23,000 cfm.	EURUBBERMIX2
FGCOLDCLEANERS	Six small wash stations for cleaning parts.	EU002CLEAN

**FGRTO  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

An automated chain-on-edge spray line, four (4) Silver spray lines, and an overmolding spray system all used to coat metal and plastic parts.

**Commented [ALD1]:** Update to match flexible group summary table

**Emission Units:** EUSIL01, EUSIL02, EUSIL03, ~~EUSIL04~~, EUCOE01, ~~EUACO02~~EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4 EUPR1, EURC1, EURC2, EURC3

**POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer (RTO), fabric filters

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	50.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGRTO	SC VI.2, VI.3	<b>R 336.1205, R 336.1702(a), Paragraph 9.A.1 Consent Order AQD No. 25-2016</b>
2. VOCs	23.6 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	<u>EUPR1, EURC1, EURC2, and EURC3 combined</u> EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, and EUADHESIVE4 collectively	SC VI.2, SC VI.4	<b>R 336.1205, R 336.1702(a)</b>
3. Ethylbenzene	2.3 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	<u>EUPR1, EURC1, EURC2, and EURC3 combined</u> EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, and EUADHESIVE4 collectively	SC VI.6	<b><del>R 336.1224,</del> R 336.1225</b>

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
4. Methyl isobutyl ketone	11.0 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	<del>EUPR1, EURC1, EURC2, and EURC3 combined</del> EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, And EUADHESIVE4 collectively	SC VI.6	<del>R 336.1224, R 336.1225</del>

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.<sup>2</sup> (R 336.1224, R 336.1702(a), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.<sup>2</sup> (R 336.1224, R 336.1370, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.<sup>2</sup> (R 336.1224, R 336.1702(a), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
4. The permittee shall not operate FGRT0 unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

5. The permittee shall maintain a facial velocity of 200 feet per minute through each natural draft opening of each PTE on a 3-hour block average basis.<sup>2</sup> (R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

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6. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f) for non-PTE enclosures.<sup>2</sup> (R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booths in FGRTTO unless all respective exhaust filters are installed and operating in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1301, R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
2. The permittee shall equip and maintain each spray booth in FGRTTO with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.<sup>2</sup> (R 336.1702(a), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
3. The permittee shall not operate FGRTTO unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC control efficiency (combined capture and destruction efficiencies) of 85 percent (by weight), maintaining a minimum temperature of 1,450°F, and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1,450°F based upon a 3-hour block average.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1299, R 336.1702, R 336.1910, 40 CFR 64.6(c)(1)(i), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis during operation of any portion of FGRTTO.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1299, R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
5. If the enclosure is a PTE, the permittee shall not operate ~~EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, or EURC3, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4~~ unless the respective PTE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following:<sup>2</sup> (R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
  - a. The direction of the air flow at all times must be into the enclosure; and either
  - b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.
6. If the enclosure is not a PTE, the permittee shall not operate ~~EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, or EURC3, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4~~ unless the respective enclosure is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires the following:<sup>2</sup> (R 336.1702(a), R 336.1910, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
  - a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

#### 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 determine the VOC content, water content, and density of any adhesives and coatings, as applied and as received, randomly on a yearly basis with all coatings and adhesives tested within a five-year period using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
2. ~~By February 1, 2019 or an alternate date with prior approval of the AQD District Supervisor, the permittee shall determine the overall VOC control efficiency of FGRTTO, the capture efficiency of the emission units in FGRTTO~~

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~~(including EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4), and the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and 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. Thereafter, the permittee must complete the testing once every five years from the most recent test. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702(a), R 336.1902, R 336.1910, R 336.2001, R 336.2003, R 336.2004, Paragraph 9.A.1 Consent Order AQD No. 25-2016) Within 180 days of startup of EUCOE2 and afterwards upon request of the AQD District Supervisor, the permittee shall determine the overall VOC control efficiency of FGRTO, the capture efficiency of the emission units in FGRTO (including EUPR1, EURC1, EURC2, EURC3), and the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A and 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. Thereafter, the permittee must complete the testing once every five years from the most recent test. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205, R 336.1225, R 336.1702(a), R 336.1902, R 336.1910)~~

3. At least once every two years, the permittee shall verify the operational integrity of the interlock system that shuts down spray booth operations when the temperature of the regenerative thermal oxidizer drops below the minimum temperature requirement. Verification of the interlock system's operational integrity shall be conducted using methods, plans and procedures approved by the AQD prior to testing. The permittee shall submit a notice of the anticipated test date to the District Office no later than two weeks prior to the test date, and a test report shall be submitted to the District Supervisor within 30 days after the completion of the testing. **(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 complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1299, R 336.1702, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each adhesive, coating, thinner, solvent, additive and catalyst, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.<sup>2</sup> (R 336.1225, R 336.1702, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)
3. The permittee shall keep the following information on a monthly basis for FGRT0:
  - a. Gallons (with water) of each adhesive, coating, thinner, solvent, additive and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive and catalyst used to coat plastic parts.
  - b. Where applicable, gallons (with water) of each material reclaimed.
  - c. VOC content (with water) of each material as applied.
  - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD District Supervisor.<sup>2</sup> (R 336.1205, R 336.1702(a), ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

4. ~~The permittee shall keep the following information on a monthly basis for EUPR1, EURC1, EURC2, and EURC3:
  - a) Gallons (with water) of each adhesive, coating, thinner, solvent, additive and catalyst used to coat metal parts and each adhesive, coating, thinner, solvent, additive and catalyst used to coat plastic parts.
  - b) Where applicable, gallons (with water) of each material reclaimed.
  - c) VOC content (with water) of each material as applied.
  - d) VOC mass emission calculations for EUPR1, EURC1, EURC2, and EURC3 combined determining the monthly emission rate in tons per calendar month.
  - e) VOC mass emission calculations for EUPR1, EURC1, EURC2, and EURC3 combined determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.The records shall be kept using mass balance or an alternative method and format acceptable to the AQD District Supervisor. (R 336.1205, R 336.1702(a))~~

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5. The permittee shall keep the following information on a monthly basis for all adhesive coating lines:
  - a. Gallons (with water) of each ethylbenzene and methyl isobutyl ketone containing material used.
  - b. Where applicable, gallons (with water) of each ethylbenzene and methyl isobutyl ketone containing material reclaimed.
  - c. The ethylbenzene and methyl isobutyl ketone content (with water) in pounds per gallon of each material used.
  - d. Ethylbenzene and methyl isobutyl ketone mass emission calculations determining the monthly emission rate in tons per calendar month.
  - e. Ethylbenzene and methyl isobutyl ketone mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1224, R 336.1225)

6. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the RTO on a continuous basis, during operation of FGRT0. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. All records shall be kept on file and made available to the Department upon request.<sup>2</sup> (R 336.1205, R 336.1299, R 336.1702, ~~Paragraph 9.A.1 Consent Order AQD No. 25-2016~~)

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7. The permittee shall keep, in a satisfactory manner, operating temperature records for the RTO as required by SC IV.3. If the measured operating temperature of the RTO falls below 1,450°F during operation of FGRT0, the permittee may demonstrate compliance based upon a three-hour block average temperature, by calculating the average operating temperature for each three hour period which includes one or more temperature readings below 1,450°F. The permittee shall keep all records and calculations on file at the facility and make them available to the Department upon request.<sup>2</sup> **(R 336.1205, R 336.1225, R 336.1299, R 336.1702, R 336.1910, 40 CFR Part 63, Subpart M, Paragraph 9.A.1 Consent Order AQD No. 25-2016))**

**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. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of ~~the new EUCOE2 each adhesive coating line (EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, and EUADHESIVE4).~~<sup>2</sup> **(R 336.1201(7)(a))**
5. ~~The permittee shall notify the AQD District Supervisor, in writing, of the installation of the second adhesive line (EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4).~~<sup>1</sup> **(R 336.1225)**

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. SVRTO	24 <sup>2</sup>	38 <sup>2</sup>	<b>R 336.1225, 40 CFR 52.21(c) &amp; (d), Paragraph 9.A.1 Consent Order AQD No. 25-2016</b>

**IX. OTHER REQUIREMENT(S)**

1. ~~The permittee shall cease operation of EUSIL04 upon the installation of the second adhesive line (EUADHESIVE2, EUADHESIVE3, or EUADHESIVE4). The permittee shall notify the District Supervisor upon the installation of the second adhesive line and the removal of EUSIL04.~~<sup>1</sup> **(R 336.1225)**
- 2.1 The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and M MMM as they apply to FGRT0.<sup>2</sup> **(40 CFR Part 63, Subpart A and Subpart MMM, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
- 3.2 The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP as they apply to FGRT0.<sup>2</sup> **(40 CFR Part 63, Subpart A and Subpart PPPP)**

**Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).



**FGMMMM  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Each affected source subject to 40 CFR Part 63, Subpart Mmmm for the surface coating of miscellaneous metal parts and products.

**Emission Units:** ~~EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, EURC3, EUSIL04, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4~~

**POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer (RTO)

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	37.7 lbs per gal of coating solids <sup>2</sup>	12-month rolling time period, as determined at the end of each calendar month	Existing – Rubber-to-Metal Coating	SC V.1, VI.1 through VI.10	<b>40 CFR 63.3890(b)(4), Paragraph 9.B.1 Consent Order AQD No. 25-2016</b>

2. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(a) through (c):

- a. Compliant material option,
- b. Emission rate without add-on controls option, or
- c. Emission rate with add-on controls option.

The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials used when determining the emission rate.<sup>2</sup> **(40 CFR 63.3891, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

3. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the applicable emission limits at all times except during periods of startup, shutdown, and malfunction.<sup>2</sup> **(40 CFR 63.3900(a)(2)(i), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

4. If the permittee owns or operates an affected source that meets the applicability criteria of this subpart and at the same facility performs surface coating that meets the applicability criteria of any other final surface coating NESHAP in this part, the permittee may comply with a facility-specific emission limit. The procedures for calculating the facility-specific emission limit are specified in 40 CFR 63.3890(c)(2). If the facility-specific emission limit is used, then the permittee must include coating activities that meet the applicability criteria of the other subcategories that constitute more than 1% of the total coating activities. Compliance with the facility-specific emission limit and the emission limitations for all surface coating operations can be used for compliance with this and other applicable surface coating NESHAP.<sup>2</sup> **(40 CFR 63.3881(e), 40 CFR 63.3890(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

**II. MATERIAL LIMIT(S)**

NA

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

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart M as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3967. **(40 CFR 63.3892(b) and Table 1, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

Add-on Control Device	Operating Limit
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).
Emission capture system that is a PTE according to 40 CFR 63.3965(a).	a. The direction of the air flow at all times must be into the enclosure; and b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.
Emission capture system that is not a PTE according to 40 CFR 63.3965(a).	a. The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device according to 40 CFR 63.3967(f).

2. For any coating operation(s) using the emission rate with add-on controls option, 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/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The work practice plan shall specify practices and procedures to ensure at a minimum the following elements are implemented:
  - a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.<sup>2</sup> **(40 CFR 63.3893(b)(1), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.<sup>2</sup> **(40 CFR 63.3893(b)(2), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.<sup>2</sup> **(40 CFR 63.3893(b)(3), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.<sup>2</sup> **(40 CFR 63.3893(b)(4), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.<sup>2</sup> **(40 CFR 63.3893(b)(5), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - f. 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).<sup>2</sup> **(40 CFR 63.3893(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

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).<sup>2</sup> **(40 CFR 63.3893(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

3. If the affected source uses an emission capture system and add-on control device, the permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The SSMP must also address any

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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.<sup>2</sup> (40 CFR 63.3900(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

4. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction.<sup>2</sup> (40 CFR 63.3900(a)(2)(ii), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
5. Any coating operation(s) using the emission rate with add-on controls option shall be in compliance with the work practice standards in 40 CFR 63.3893 at all times.<sup>2</sup> (40 CFR 63.3900(a)(2)(iii), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall not operate FGMMMM unless the RTO is installed, maintained, and operated in a satisfactory manner.<sup>2</sup> (40 CFR 63.3892(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.3931)

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall conduct each performance test required by 40 CFR 63.3960 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.3964(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h).<sup>2</sup> (40 CFR 63.3964(a), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
2. The permittee shall conduct each performance test of an emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.3965 and 40 CFR 63.3966.<sup>2</sup> (40 CFR 63.3964(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii), 40 CFR 63.3931)

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12<sup>th</sup> month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months.<sup>2</sup> (40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960, Paragraph 9.B.1 Consent Order AQD No. 25-2016)
2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931.<sup>2</sup> (40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
3. The permittee shall maintain, at a minimum, the following records for each compliance period:
  - a. A copy of each notification and report that is submitted to comply with Subpart MMMM, and the documentation supporting each notification and report.<sup>2</sup> (40 CFR 63.3930(a), Paragraph 9.B.1 Consent Order AQD No. 25-2016)
  - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating.<sup>2</sup> (40 CFR 63.3930(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)

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- c. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used.<sup>2</sup> **(40 CFR 63.3930(c)(1), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - d. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.3930(c)(4)(i) through (v).<sup>2</sup> **(40 CFR 63.3930(c)(4), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - e. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the volume used.<sup>2</sup> **(40 CFR 63.3930(d), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - f. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight.<sup>2</sup> **(40 CFR 63.3930(e), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - g. The volume fraction of coating solids for each coating used during each compliance period.<sup>2</sup> **(40 CFR 63.3930(f), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - h. For the emission rate with add-on controls option, the density of each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(g), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - i. The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4).<sup>2</sup> **(40 CFR 63.3930(h), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - j. The date, time, and duration of each deviation.<sup>2</sup> **(40 CFR 63.3930(j), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - k. For the emission rate with add-on controls option, records specified in 40 CFR 63.3930(k)(1) through 40 CFR 63.3930(k)(8).<sup>2</sup> **(40 CFR 63.3930(k), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
4. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 of 40 CFR Part 63, Subpart Mmmm using the applicable method(s) described below.<sup>2</sup> **(40 CFR 63.3963(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).	i. Collect the combustion temperature data according to 40 CFR 63.3968(c); ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
Emission capture system that is a PTE according to 40 CFR 63.3965(a).	a. The direction of the air flow at all times must be into the enclosure; and b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute.	i. Collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.3968(g)(1); and ii. Maintain the facial velocity of air flow through all natural draft openings at or above the facial velocity limit and maintain the direction of air flow into the enclosure at all times.

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Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Emission capture system that is not a PTE according to 40 CFR 63.3965(a).	a. The average gas volumetric flow rate in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate established for that capture device according to 40 CFR 63.3967(f).	i. Collect the gas volumetric flow rate for each capture device according to 40 CFR 63.3968(g); ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average gas volumetric flow rate for each capture device at or above the gas volumetric flow rate.

5. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to the procedures in 40 CFR 63.3961.<sup>2</sup> **(40 CFR 63.3963, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
6. During the performance test required by 40 CFR 63.3960, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.3967 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.3892.<sup>2</sup> **(40 CFR 63.3967, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.3968(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.3968(b).<sup>2</sup> **(40 CFR 63.3968, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
8. The permittee must apply to the USEPA for approval of alternative monitoring under 40 CFR 63.8(f), if using an add-on control device other than those listed in Table 1 of 40 CFR Part 63, Subpart M, or to monitor an alternative parameter and comply with a different operating limit.<sup>2</sup> **(40 CFR 63.3892(c), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

**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 the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7):
  - a. The organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890.<sup>2</sup> **(40 CFR 63.3963(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - b. An operating parameter is out of the allowed range.<sup>2</sup> **(40 CFR 63.3963(c)(1), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened.<sup>2</sup> **(40 CFR 63.3963(d), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
  - d. Deviations from work practice standards occur.<sup>2</sup> **(40 CFR 63.3963(e), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

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5. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910.<sup>2</sup> **(40 CFR Part 63, Subparts A and M MMM, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
6. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance.<sup>2</sup> **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for emission capture systems and add-on control devices.<sup>2</sup> **(40 CFR 63.3920(b), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**
8. If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit an SSM report as specified in 40 CFR 63.3920(c).<sup>2</sup> **(40 CFR 63.3920(c), 40 CFR 63.10(d), Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

See Appendix 8

#### **VIII. STACK/VENT RESTRICTION(S)**

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 M MMM for Surface Coating of Miscellaneous Metal Parts and Products.<sup>2</sup> **(40 CFR Part 63, Subparts A and M MMM, Paragraph 9.B.1 Consent Order AQD No. 25-2016)**

#### **Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **FGCAM FLEXIBLE GROUP CONDITIONS**

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### **DESCRIPTION**

~~40 CFR Part 64, Compliance Assurance Monitoring (CAM) requirements for the pollutant specific emission unit (defined as FGRT0) that has potential pre-control emissions over 100 percent of the major source threshold.~~

~~**Emission Units:** EUSIL01, EUSIL02, EUSIL03, EUSIL04, EUCOE01, EUAMS02, EUADHESIVE1, EUADHESIVE2, EUADHESIVE3, EUADHESIVE4, (FGRT0)~~

### **POLLUTION CONTROL EQUIPMENT**

~~Regenerative Thermal Oxidizer~~

#### **I. EMISSION LIMIT(S)**

~~NA~~

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

~~NA~~

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

~~NA~~

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

~~1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis during operation of any portion of FGRT0. **(40 CFR 64.6(c)(1)(i) and (ii))**~~

#### **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))**~~

~~1. The permittee shall continuously monitor combustion chamber temperature and record the combustion temperature data per FGRT0, SC VI.6 and VI.7. The average combustion temperature in any 3-hour period must not fall below the indicator combustion temperature identified in Appendix 3. **(40 CFR 64.6(c)(1)(i) and (ii))**~~

~~2. The permittee shall verify the accuracy of chamber thermocouples on a monthly basis. **(40 CFR 64.6(c)(1)(iii))**~~

~~3. The permittee shall continuously monitor the air flow to the RTO using the CPMS. The air flow to the RTO shall not fall outside the indicator range identified in Appendix 3. **(40 CFR 64.6(c)(1)(i) and (ii))**~~

~~4. The permittee shall verify the capture system for a non-PTE (EUSIL01) by monitoring the average gas volumetric flow rate in the duct between the capture device and the add-on control device inlet in accordance with 40 CFR 63.3965(a). The average volumetric flow rate shall not fall below the indicator range identified in Appendix 3. **(40 CFR 64.3(a)(2))**~~

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- ~~5. The permittee shall monitor the capture system that is a PTE by determining the average facial velocity of air through all natural draft openings in the enclosure in accordance with 40 CFR 63.3968(g)(1). The average facial velocity shall be determined by monitoring the booth exhaust airflow (in cfm) and ensuring that the airflow does not fall below the following indicator ranges identified in Appendix 3. (40 CFR 64.3(a)(2))~~
- ~~6. The permittee shall verify the accuracy of each transducer and visually inspect sensing tubes for leaks, blockage, or damage on a monthly basis. (40 CFR 64.6(c)(1)(iii))~~
- ~~7. The permittee shall evaluate the capture system that is a PTE by continuously monitoring the pressure of airflow to determine the direction of airflow into the enclosure. The pressure shall be continuously monitored on the CPMS and shall be negative. (40 CFR 64.3(a)(2))~~
- ~~8. An excursion is a departure from the indicator ranges identified in Appendix 3. (40 CFR 64.6(c)(2))~~
- ~~9. Upon detecting an excursion or exceedance, the owner or operator shall immediately cease operation of FGRTQ and shall restore normal operation of FGRTQ (including the control device and associated capture system) as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions prior to restarting operations. 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). See Appendix 3 for the corrective action plan. (40 CFR 64.7(d))~~
- ~~10. 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))~~
- ~~11. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))~~
- ~~12. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. (40 CFR 64.9(b)(1))~~
- ~~13. The permittee shall determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation. (40 CFR 64.3(a)(2))~~

**See Appendix 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))~~



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- ~~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 and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. (40 CFR 64.9(a)(2)(i))~~
- ~~5. Each semiannual 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))~~
- ~~6. Each semiannual report of monitoring and deviations shall include a description of the actions taken to implement a QIP during the reporting period (if appropriate). If a QIP has been completed, the report shall include documentation that the plan has been implemented and if it has reduced the likelihood of excursions or exceedances. (40 CFR 64.9(a)(2)(iii))~~

See Appendix 8

#### VIII. STACK/VENT RESTRICTION(S)

NA

#### IX. OTHER REQUIREMENTS

- ~~1. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)~~
- ~~2. 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 ROP 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))~~
- ~~3. The permittee shall submit a QIP if 6 excursions occur in any 3-month period. (40 CFR 64.8(a))~~

#### **Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGDDDD**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Requirements for existing Gas 1, (Natural Gas only) for new and existing Boilers and Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These boilers or process heaters must comply with this subpart except as provided in 40 CFR 63.6(i).

**Emission Units:** EUBOILER2, EUBOILER4

The collection at a major source of all existing industrial, commercial, and institutional boilers and process heaters within the units designed to burn gas 1 fuel subcategory as defined in 40 CFR 63.7575. At the time of permit renewal:

Less than 5 MMBtu/hr	NA
Equal to or greater than 5 MMBtu/hr and less than 10 MMBtu/hr	NA
Equal to or greater than 10 MMBtu/hr	EUBOILER2 EUBOILER4

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. The permittee shall only burn natural gas. **(40 CFR 63.7499(l))**

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

1. The permittee must meet the tune-up and Energy Assessment work practice standards for each applicable boiler or process heater at the source. **(40 CFR 63.7500(a)(1), 40 CFR Part 63, Subpart DDDDD, Table 3, Nos. 1-4)**
2. The permittee must operate and maintain affected sources 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. **(40 CFR 63.7500(a)(3))**
3. The permittee may obtain approval from the Administrator to use an alternative to the work practice standards noted in SC III.1 and/or SC III.2. **(40 CFR 63.7500(b))**
4. The permittee must:
  - a. Complete a tune-up every 5 years (61 months) for boilers/process heaters less than or equal to 5 million Btu per hour. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**
  - b. Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. **(40 CFR 63.7500(e), 40 CFR 63.7515(d))**
  - c. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. **(40 CFR 63.7540(a)(10), 40 CFR 63.7515(d))**

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- d. Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up. **(40 CFR 63.7540(a)(13))**
  - e. Follow the procedures described in SC IX 4.a through SC IX 4.f for all initial and subsequent tune ups. **(40 CFR 63.7540(a)(10), 40 CFR Part 63, Subpart DDDDD, Table 3)**
  - f. Complete the Initial tune ups on all affected units no later than January 31, 2016, except as provided in **40 CFR 63.7510(j)** and **40 CFR 63.7540(a)(13)**.
5. For EU-BOILER2, the permittee must complete the one-time energy assessment no later than January 31, 2016. **(40 CFR 63.7510(e))**
  6. For EU-BOILER4, the permittee must complete the one-time energy assessment no later than 180 days after startup. **(40 CFR 63.7510(e))**
  7. For affected sources, as defined in 40 CFR 63.7490, that switch subcategory consistent with 40 CFR 63.7545(h) after the initial compliance date, you must demonstrate compliance within 60 days of the effective date of the switch, unless you had previously conducted your compliance demonstration for this subcategory within the previous 12 months. **(40 CFR 63.7510(k))**

#### **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))**

1. The permittee must keep a copy of each notification and report 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))**
2. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. **(40 CFR 63.7560(a), (b), and (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. The permittee must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60<sup>th</sup> day following the completion of the initial compliance demonstrations for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following

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information and must be submitted within 60 days of the compliance date specified at 40 CFR 63.7495(b).  
**(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 40 CFR Part 63, Subpart DDDDD, description of the fuel(s) burned. **(40 CFR 63.7545(e)(1))**
  - b. Certification(s) of compliance, as applicable, and signed by a responsible official: **(40 CFR 63.7545(e)(8))**
    - i. "This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR 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))**
5. The permittee must submit boiler tune-up compliance reports. The first compliance report shall cover the period January through December of the year in which the tune up was completed and must be postmarked or submitted no later than March 15<sup>th</sup> of the reporting year that immediately follows the year in which the tune-up was completed. 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 40 CFR 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 40 CFR 63.7495. Each subsequent semiannual 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. Each subsequent semiannual compliance report must be postmarked or submitted no later than September 15 or March 15, 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 March 15. Compliance reports must be submitted using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to the Air Quality Division and EPA Region 5. At the discretion of the Administrator, the permittee must submit these reports, in the format specified by the Administrator. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. **(40 CFR 63.7550(b), 40 CFR 63.10(a)(5), 40 CFR 63.7550(h)(3))**
6. 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 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 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))**
7. The permittee must include the following information in the compliance report. **(40 CFR 63.7550(c), 40 CFR 63.7550(c)(1))**
- a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
  - b. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**
  - c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
  - d. Include the date of the most recent tune-up for each unit. 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))**
  - e. 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))**

See Appendix 8

#### **VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee must comply with applicable provisions of 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7495(b))**
2. The permittee must be in compliance with the applicable work practice standards. **(40 CFR 63.7505(a))**
3. For affected sources (as defined in 40 CFR 63.7490) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up within 30 days of startup by following the procedures described in SC IX 4.a through 4.f. **(40 CFR 63.7515(g))**
4. The permittee must demonstrate continuous compliance with the tune-up requirement by completing the following: **(40 CFR 63.7540(a))**
  - a. Inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
  - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
  - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.7540(a)(10)(iii))**
  - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
  - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
  - f. Maintain on-site and submit, if requested by the Administrator, the most recent periodic report containing the information as listed below. **(40 CFR 63.7540(a)(10)(vi))**
    - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
    - ii. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
    - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**
5. If the boiler or process heater has a heat input capacity of less than or equal to 5 million Btu per hour, the permittee may delay the burner inspection specified in SC IX 4.a until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. . If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. **(40 CFR 63.7540(a)(12))**

**Footnotes:**

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

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**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, 278a and 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

**Emission Units installed prior to December 20, 2016:** EURUBBERMIX2

**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(2)(a)(i))**
2. Any emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other 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(2)(a)(ii))**
  - a. For toxic 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 micrograms 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(2)(a)(ii)(A))**
  - b. For toxic 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(2)(a)(ii)(B))**
  - c. The emission unit shall not emit any toxic 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(2)(a)(ii)(C))**
  - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(D))**
  - e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(E))**
3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: **(R 336.1290(2)(a)(iii))**

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- 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 exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**
- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(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)**
2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:
  - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following **(R 336.1290(2)(b)(i), R 336.1910)**
    - i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
    - ii. Wet scrubbers equipped with a liquid flow rate monitor.
    - iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
  - b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. **(R 336.1290(2)(b)(ii), R 336.1910)**

## **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 DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a 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(2)(a)(ii) and (iii). **(R 336.1213(3))**
  - e. Records of 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. Volatile organic compound emissions shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**
  - f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**
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(2)(c), R 336.1213(3))**
  - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(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(2)(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



**FGCOLDCLEANERS  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Six small wash stations for cleaning parts.

**Emission Unit:** EU002CLEAN

**POLLUTION CONTROL EQUIPMENT**

NA

**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(2)(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(2)(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:

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- 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(2)(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

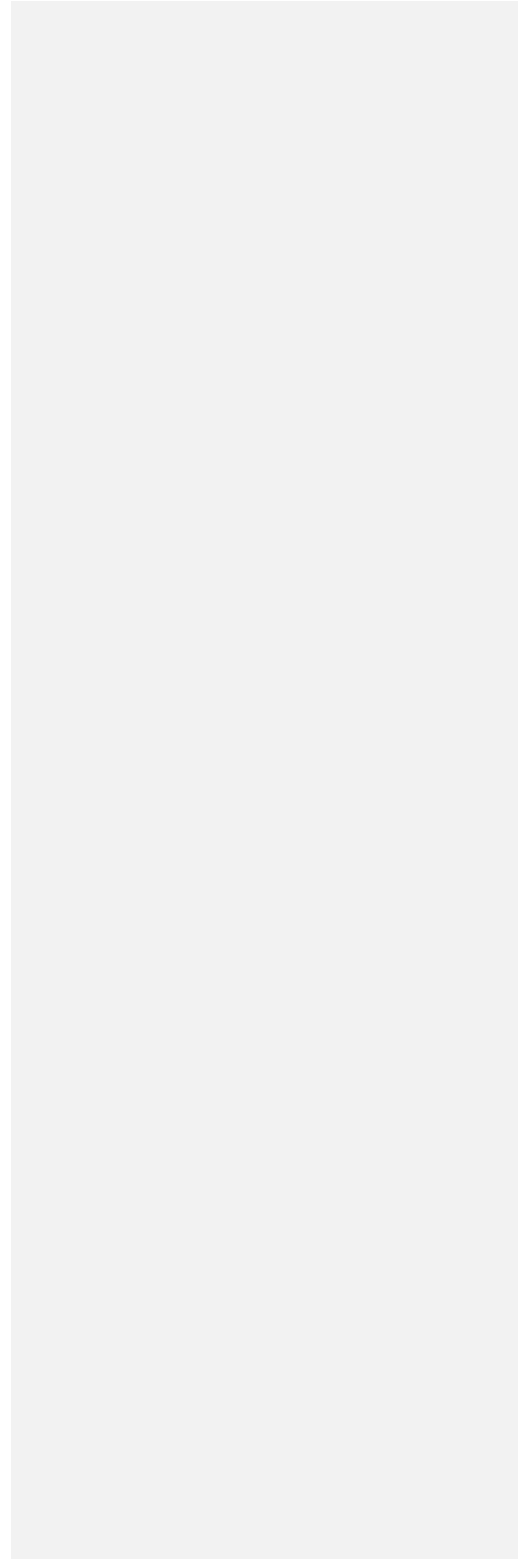
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**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA



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## **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. Acronyms and Abbreviations

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 <sub>2e</sub>	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 Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H <sub>2</sub> S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO <sub>x</sub>	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO <sub>2</sub>	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

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**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**

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FGCAM. The following indicator operating ranges, or alternate values as established through testing, shall be used to satisfy monitoring in FGCAM. Any changes to the values below shall be updated in the source's Malfunction Abatement Plan.

Unit	Operating Condition	Operating Range	Monitoring Frequency	Corrective Action in the event of Malfunction
RTO	Temperature	Minimum 1577°F (3-hour block average)	Continuous	Do not operate the coating processes unless the RTO is within the proper operating range. In the event of an RTO system fault, the system will shut down and sound an alarm. If the RTO faults and shuts down, all coating operations must be stopped as quickly as possible. The fault should be examined to determine the cause of the out of range reading and a repair determined. After the problem has been fixed, the RTO system must be restarted as per the SSMP to return the unit to operation before coating operations can resume.
Non-PeTE for EUSIL01	Stack CFM	CFM greater than 2,369 (3-hour block average)	Continuous	Do not operate the coating process required to be inside the non-permanent total enclosure unless the exhaust CFM is above the operating limit noted. If the CFM minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL02	Airflow direction  Face Velocity	Toward RTO (into booth)  CFM greater than 236 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless the face velocity is above the operating limit noted. If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL03	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 554 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUSIL04	Airflow direction  Stack-CFM	Toward RTO (into-booth)  CFM greater than 502	Continuous	<del>Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating</del>

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		(equivalent to 200 FPM at NDO's (3-hour block average))		method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
PeTE for EUCOE01	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 296 (equivalent to 200 FPM at NDO's) (3-hour block average)	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
<u>PeTE for EUPR1</u>	<u>Airflow direction</u>  <u>Stack CFM</u>	<u>Toward RTO (into booth)</u>  <u>CFM greater than 174 (equivalent to 200 FPM at NDO's) (3-hour block average)</u>	<u>Continuous</u>	<u>Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).</u> <u>If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.</u> <u>In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.</u>
<u>PeTE for EURC1</u>	<u>Airflow direction</u>  <u>Stack CFM</u>	<u>Toward RTO (into booth)</u>  <u>CFM greater than 174 (equivalent to 200 FPM at NDO's) (3-hour block average)</u>	<u>Continuous</u>	<u>Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).</u> <u>If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.</u> <u>In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.</u>
<u>PeTE for EURC2</u>	<u>Airflow direction</u>  <u>Stack CFM</u>	<u>Toward RTO (into booth)</u>  <u>CFM greater than 174 (equivalent to 200 FPM at NDO's) (3-hour block average)</u>	<u>Continuous</u>	<u>Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).</u> <u>If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.</u> <u>In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.</u>
<u>PeTE for EURC3</u>	<u>Airflow direction</u>  <u>Stack CFM</u>	<u>Toward RTO (into booth)</u>  <u>CFM greater than 174 (equivalent to 200 FPM at NDO's) (3-hour block average)</u>	<u>Continuous</u>	<u>Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure).</u> <u>If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected.</u> <u>In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.</u>
PeTE for EUAMS02	Airflow direction  Stack CFM	Toward RTO (into booth)  CFM greater than 6 (equivalent to	Continuous	Do not operate the coating process required to be inside the permanent total enclosure unless it is under negative pressure (airflow into the enclosure). If the face velocity minimum alarm is activated, maintenance will determine if the direction of airflow is into the enclosure using visual indicating method (i.e. streamer) or with handheld differential meter. If the direction of the airflow is into the enclosure, maintenance will audit the

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		200 FPM at NDO's (3-hour block average)		transducer. If airflow is determined to be out of the enclosure, the coating operation will be stopped as quickly as possible, and the airflow direction corrected. In the event of a malfunction, follow procedures outlined in the Malfunction Abatement Contingency Plan.
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#### 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

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. 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-E5094-2012. 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-E5094-2012c is being reissued as Source-Wide PTI No. MI-PTI-E5094-2018.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
49-18	201800080	Addition of four new adhesive coating lines	FGRT0
183-16	201700036	Replace the rubber mixer.	EUMIX
54-06B	201500083	New plastic parts coating line to existing metal parts coating lines.	FGRT0
54-06A	201300197	New chain on edge machine to apply adhesives.	FGRT0
<del>49-18A</del>		<del>New chain on edge machine to apply adhesives.</del>	<del>FGRT0</del>

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#### Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

#### Appendix 8. Reporting

##### A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, 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.



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**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.