Michigan Department of Environmental Quality Air Quality Division

EFFECTIVE DATE: JUNE 9, 2017

ISSUED TO

FCA US, LLC – JEFFERSON NORTH ASSEMBLY PLANT

State Registration Number (SRN): N2155

LOCATED AT

2101 Conner Avenue, Detroit, Michigan 48215

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N2155-2017

Expiration Date: JUNE 9, 2022

Administratively Complete ROP Renewal Application Due Between 12-09-2020 and 12-09-2021

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N2155-2017

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

Wilhemina McLemore, Detroit 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 are state-only enforceable will be noted as such.

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

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

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R 336.1213(5))
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))

General Provisions

- 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))
- It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (R 336.1213(1)(b))
- 3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (R 336.1213(1)(c))
- 4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (R 336.1213(1)(d)):
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
- 5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R 336.1213(1)(e))

- 6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))
- 7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
- 8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

Equipment & Design

- 9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² (R 336.1370)
- 10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R 336.1910)

Emission Limits

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

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

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

Testing/Sampling

- 13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² (R 336.2001)
- 14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
- 15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(5))

Monitoring/Recordkeeping

- 16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. (R 336.1213(3)(b))
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
- 17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (R 336.1213(1)(e), R 336.1213(3)(b)(ii))

Certification & Reporting

- 18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
- 19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (R 336.1213(4)(c))
- 20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
- 21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (R 336.1213(3)(c))
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

- 22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following (R 336.1213(3)(c)):
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
- 23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. (R 336.1213(3)(c)(i))
- 24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. (R 336.1212(6))
- 25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² (**R 336.1912**)

Permit Shield

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

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

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

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))
- 28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(iii))
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (R 336.1216(1)(c)(iii))
 - d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))
- 29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(c), R 336.1217(1)(a))

Revisions

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (R 336.1210(10))
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

- 36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
- 37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

- 38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
- 39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - c. The date on which a regulated substance is first present above a threshold quantity in a process.
- 40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
- 41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit To Install (PTI)

- 43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (R 336.1201(1))
- 44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (R 336.1201(8), Section 5510 of Act 451)
- 45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² (R 336.1219)
- 46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, 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.² (R 336.1201(4))

Footnotes:

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-GRINDING	Welding, grinding, and sanding operations.	1/1/1991	FG-FACILITY
EU-SEALERS	Sealers and adhesives used in frame/body and paint are applied to the vehicles. Emissions are released, uncontrolled, to the general in-plant environment.	1/1/1991	FG-FACILITY FG-AUTO-MACT
EU-ECOAT	Auto bodies are primed in an enclosed electrocoat dip tank system followed by a curing oven.	1/1/1991	FG-FACILITY FG-CONTROLS FG-AUTO-MACT
EU-GUIDECOAT	A powder guidecoat system used to apply a coating in-between the electrocoat and topcoat.		FG-FACILITY FG-AUTO-MACT
EU-TOPCOAT1	Topcoat is applied to vehicles automatically and manually in booths. Vehicles pass through associated curing oven(s).	1/1/1991	FG-FACILITY FG-CONTROLS FG-AUTO-MACT
EU-TOPCOAT2	Topcoat is applied to vehicles automatically and manually in booths. Vehicles pass through associated curing oven(s).	1/1/1991	FG-FACILITY FG-CONTROLS FG-AUTO-MACT
EU-TOPCOAT3	Topcoat is applied to vehicles automatically and manually in booths. Vehicles pass through associated curing oven(s).	8/1/1998	FG-FACILITY FG-CONTROLS FG-AUTO MACT
EU-TOUCHUP	Blemished areas on vehicles are identified and repaired. This process is performed manually and emissions are vented into the in-plant environment.	1/1/1991	FG-FACILITY FG-AUTO-MACT
EU-FINALSEALER	Sealers are applied to auto bodies manually and robotically. Sealer is air cured, and the exhaust is vented in the plant.	1/1/1991	FG-FACILITY FG-AUTO-MACT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-GASFILL	Fuel is dispensed into the vehicle tank and vapors from the filling operations are controlled via on-board refueling vapor recovery (ORVR).	1/1/1991	FG-FACILITY
EU-WINDSHIELDFILL	Windshield fluid fill station.	1/1/1991	FG-FACILITY
EU-LOWBAKE	Blemished areas on finished vehicles are repaired in booths. This includes any preparations such as sanding. The blemished area is painted and cured in booths. Stacks are used for exhaust.	1/1/1991	FG-FACILITY FG-AUTO MACT
EU-WIPE	Auto bodies are manually wiped with solvents during different phases of painting and assembly. The emissions are vented into the plant or through a stack.	1/1/1991	FG-FACILITY FG-AUTO-MACT
EU-PURGE	Purge and non-production solvents associated with EUTOPCOAT1, EUTOPCOAT2, and EUTOPCOAT3.	1/1/1991	FG-FACILITY FG-AUTO-MACT
EU-TF-O-004	Ethylene Glycol Tank-3, capacity = 15,000 gal	10/6/1989	FG-FACILITY
EU-TF-O-005	Gasoline Tank-4, capacity = 15,000 gal	10/6/1989	FG-FACILITY
EU-TF-O-006	Gasoline Tank-5, capacity = 15,000 gal	10/6/1989	FG-FACILITY
EU-METHANOLTANK	Methanol storage tank used for windshield washer fill.	10/6/1989	FG-FACILITY FG-OLD-MACT
EU-BOILER1	Hot water is generated for plant use in a natural gas boiler. The boiler uses low NO _X burners and flue gas recirculation and a stack is utilized for exhaust. The boiler has a rated capacity of 70 MMBtu/hr.	1/1/1991	FG-FACILITY FG-BOILER-MACT
EU-BOILER2	Hot water is generated for plant use in a natural gas boiler. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust. The boiler has a rated capacity of 70 MMBtu/hr.	1/1/1991	FG-FACILITY FG-BOILER-MACT
EU-BOILER3	Hot water is generated for plant use in a natural gas boiler. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust. The boiler has a rated capacity of 70 MMBtu/hr.	1/1/1991	FG-FACILITY FG-BOILER-MACT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control	Installation Date/	Flexible Group ID
	Device(s))	Modification Date	
EU-BOILER4	Hot water is generated for plant use in	1/1/1991	FG-FACILITY
	a natural gas boiler. The boiler uses		FG-BOILER-MACT
	low NO _X burners and flue gas		
	recirculation and a stack is utilized for		
	exhaust. The boiler has a rated		
	capacity of 70 MMBtu/hr.		
EU-COLDCLEANER	Any cold cleaner that is grandfathered		FG-FACILITY
	or exempt from Rule 201 pursuant to		FG-
	Rule 278 and Rule 281(h) or Rule		COLDCLEANERS
	285(r)(iv). Existing cold cleaners were		
	placed into operation prior to July 1,		
	1979. New cold cleaners were placed		
EU-RULE287(c))	into operation on or after July 1, 1979. Any emission unit that emits air		FG-FACILITY
EO-ROLE207(C))	contaminants and is exempt from the		FG-RULE287(c)
	requirements of Rule 201 pursuant to		FG-ROLE207(C)
	Rules 278 and 287(c).		
EU-RULE 290	Any emission unit that emits air		FG-FACILITY
	contaminants and is exempt from the		FG-RULE290
	requirements of Rule 201 pursuant to		
	Rules 278 and 290.		
EU-ENG-EFP	370 HP, diesel fueled, reciprocating	6/3/1991	FG-FACILITY
	internal combustion engine.		FG-CI-RICE-MACT
EU-ENG-WFP	370 HP, diesel fueled, reciprocating	6/3/1991	FG-FACILITY
	internal combustion engine.		FG-CI-RICE-MACT
EU-	A Rule 287c exempt paint spray booth		FG-RULE287(c)
MAINTENANCE_BOOTH			

EU-GRINDING EMISSION UNIT CONDITIONS

DESCRIPTION

Welding, grinding, and sanding operations.

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT

Particulate matter collection/filtration equipment.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

	Material	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA	4	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall operate any portion of EUGRINDING which exhaust externally with its respective particulate matter collection/filtration equipment installed and operating properly.² (R336.1213(3))

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-SEALERS EMISSION UNIT CONDITIONS

DESCRIPTION

Sealers and adhesives used in frame/body and paint are applied to the vehicles.

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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

NA

V. TESTING/SAMPLING

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

 The VOC content of each sealer and adhesive, as applied, shall be determined using federal Reference Test Method 24 at representative time(s) and temperature(s) used to cure the related coating or material in practice as provided by ASTM D2369-98, 1.4 and Note 3. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content of each sealer and adhesive shall be verified by testing at owner's expense.² (R336.1205, R336.1702(a))

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

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

- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-ECOAT EMISSION UNIT CONDITIONS

DESCRIPTION

Auto bodies are primed in an enclosed electrocoat dip tank system followed by a curing oven. VOC emissions from the curing oven are controlled by two thermal oxidizers.

Flexible Group IDs: FG-FACILITY, FG-CONTROLS, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

Two oven thermal oxidizers.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

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

 The permittee shall not operate EU-ECOAT unless the two thermal oxidizers are both installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum temperature of 1,360 °F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance based upon a three hour average, and has a minimum retention time of 0.5 seconds.² (R 336.1220(a), R 336.1225, R336.1910, 40 CFR 64.6(c)(1)(i),(ii))

V. TESTING/SAMPLING

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

 The VOC content, water content and density of the resin, pigment and additives, as added to the Electrocoat tank, shall be determined using federal Reference Test Method 24. Alternatively, the VOC content, water content and density of the subject materials may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of the resin, pigment and additives as added to the Electrocoat tank shall be verified by testing using federal Reference Test Method 24.² (R336.1220)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. (40 CFR 64.9(a)(2)(i))

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. SVST-PS-027	402	69 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
2. SVST-PS-102	402	69 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

- 1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: (64.6(c)(2))
 - a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special condition IV.1.
- 2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)

Footnotes:

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

EU-TOPCOAT1 EMISSION UNIT CONDITIONS

DESCRIPTION

Paint is applied to vehicles automatically and manually in booths. Vehicles proceed through a curing oven. This line consists of three basecoat robot zones, basecoat electrostatic bells, basecoat automatic conventional zone, heated flash zone, two clearcoat robot zones, clearcoat electrostatic bells zone and a cure oven. Emissions from the basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones are ducted to a filter house, concentrator, and a thermal oxidizer. Emissions from the oven are controlled by a separate thermal oxidizer.

Flexible Group IDs: FG-FACILITY, FG-CONTROLS, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

A water wash system, a concentrator, and two thermal oxidizers.

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

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate the spray booth portions of EU-TOPCOAT1 unless the water wash particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the water wash particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 2.² (R336.1205, R336.1220, R336.1331, R336.1910)
- 2. The permittee shall not operate the oven portion of EU-TOPCOAT1 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum temperature of 1,310 °F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average, and a minimum retention time of 0.5 seconds.² (R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))
- 3. The permittee shall not operate the paint spray booth portions (basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones) of EU-TOPCOAT1 unless the thermal oxidizer and the concentrator are both installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum combustion chamber temperature of 1325°F, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average and a minimum retention time of 0.5

seconds. Satisfactory operation of adsorption wheels include maintaining a minimum desorption gas inlet temperature of no more than 15°F below the average desorption gas inlet temperature during the most recent acceptable performance test values.² (R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))

V. TESTING/SAMPLING

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

 The VOC content of any coating or material as applied or as received shall be determined using federal Reference Test Method 24 and formulation data as specified in the USEPA "Protocol for Determining the Daily Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. Upon request of the AQD District Supervisor, the analytical VOC content, as received, of each non-waterborne coating shall be verified by testing at owner's expense.² (R336.1205, R336.1702(a), 40 CFR 60 Subpart MM)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. (40 CFR 64.9(a)(2)(i))

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. SVST-PS-039 (EU-TOPCOAT1)	120 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
2. SVST-PS-041	108 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
3. SVST-PS-043	108 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
4. SVST-PS-001	882	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
5. SVST-PS-004	55 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
6. SVST-PS-047	26 ²	69 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

- 1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: (64.6(c)(2))
 - a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special conditions IV.2 and IV.3.
- 2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)

Footnotes:

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

EU-TOPCOAT2 EMISSION UNIT CONDITIONS

DESCRIPTION

Paint is applied to vehicles automatically and manually in booths. Vehicles proceed through a curing oven. This line consists of three basecoat robot zones, basecoat electrostatic bells, basecoat automatic conventional zone, heated flash zone, two clearcoat robot zones, clearcoat electrostatic bells zone and a cure oven. Emissions from the basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones are ducted to a filter house, concentrator, and a thermal incinerator. Emissions from the oven are controlled by a separate thermal incinerator.

Note: There are two thermal incinerators for this emission unit.

Flexible Group IDs: FG-FACILITY, FG-CONTROLS, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

A water-wash system, a concentrator, and two thermal oxidizers.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1 The permittee shall not operate the spray booth portions of EU-TOPCOAT2 unless the water wash particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the water wash particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 3.² (R336.1205, R336.1220, R336.1331, R336.1910)
- 2. The permittee shall not operate the oven portion of EU-TOPCOAT2 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum temperature of 1,310 °F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average, and a minimum retention time of 0.5 seconds.² (R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))
- 3. The permittee shall not operate the paint spray booth portions (basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones) of EU-TOPCOAT2 unless the thermal oxidizer and the concentrator are both installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum combustion chamber temperature of 1330°F or at the temperature during the most recent control device performance test which demonstrated compliance with a

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minimum of 95% destruction efficiency based upon a three hour average and a minimum retention time of 0.5 seconds. Satisfactory operation of the adsorption wheels include maintaining a minimum desorption gas inlet temperature of no more than 15°F below the average desorption gas inlet temperature during the most recent acceptable performance test values.² (R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))

V. TESTING/SAMPLING

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

 The VOC content of any coating or material as applied or as received shall be determined using federal Reference Test Method 24 and formulation data as specified in the USEPA "Protocol for Determining the Daily Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. Upon request of the AQD District Supervisor, the analytical VOC content, as received, of each non-waterborne coating shall be verified by testing at owner's expense.² (R336.1205, R336.1702(a), 40 CFR 60 Subpart MM)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. (40 CFR 64.9(a)(2)(i))

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. SVST-PS-040 (EU-TOPCOAT2)	120 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
2. SVST-PS-042	108 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
3. SVST-PS-044	108 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

FCA US, LLC JEFFERSON NORTH ASSEMBLY PLANT

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
4. SVST-PS-002	88 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
5. SVST-PS-004	55 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
6. SVST-PS-048	26 ²	69 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

- 1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: (64.6(c)(2))
 - a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special conditions IV.2 and IV.3.
- 2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)

Footnotes:

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

EU-TOPCOAT3 EMISSION UNIT CONDITIONS

DESCRIPTION

Paint is applied to vehicles automatically and manually in booths. Vehicles proceed through a curing oven. This line consists of three basecoat robot zones, basecoat electrostatic bells, basecoat automatic conventional zone, heated flash zone, two clearcoat robot zones, clearcoat electrostatic bells zone and a cure oven. Emissions from the basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones are ducted to a filter house, concentrator, and a thermal incinerator. Emissions from the oven are controlled by a separate thermal incinerator.

Note: There are two thermal incinerators for this emission unit.

Flexible Group IDs: FG-FACILITY, FG-CONTROLS, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

A water-wash system, a concentrator, and two thermal oxidizers

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall not operate the spray booth portions of EU-TOPCOAT3 unless the water wash particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the water wash particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 3.² (R336.1205, R336.1220, R336.1331, R336.1910, 40 CFR 52.21(x)(6)(iv))
- 2. The permittee shall not operate the oven portion of EU-TOPCOAT3 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum temperature of 1,310 °F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average, and a minimum retention time of 0.5 seconds.² (R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))
- 3. The permittee shall not operate EU-TOPCOAT3 unless the spray booth thermal oxidizer and the concentrator are all installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizers includes maintaining a minimum combustion chamber temperature of 1310°F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average, and a minimum

retention time of 0.5 seconds. Satisfactory operation of the adsorption wheels include maintaining a minimum desorption gas inlet temperature of no more than 15°F below the average desorption gas inlet temperature during the most recent acceptable performance test values.² (R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))

V. TESTING/SAMPLING

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

 The VOC content of any coating or material as applied or as received shall be determined using federal Reference Test Method 24 and formulation data as specified in the USEPA "Protocol for Determining the Daily Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. Upon request of the AQD District Supervisor, the analytical VOC content, as received, of each non-waterborne coating shall be verified by testing at owner's expense.² (R336.1205, R336.1702(a), 40 CFR 60 Subpart MM)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. (40 CFR 64.9(a)(2)(i))

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. SVST-PS-089	1202	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
2. SVST-PS-090	120 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
3. SVST-PS-091	120 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
4. SVST-PS-036	852	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
5. SVST-PS-037	41 ²	113 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
6. SVST-PS-095	40 ²	69 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

- 1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: (64.6(c)(2))
 - a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special condition IV.2.
- 2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)

Footnotes:

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

EU-TOUCHUP EMISSION UNIT CONDITIONS

DESCRIPTION

Blemished areas on vehicles are identified and repaired. This process is performed manually and emissions are vented into the in-plant environment.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

 The VOC content, water content and density of any coating or material as applied and as received, shall be determined using federal Reference Test Method 24. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24.² (R336.1205, R336.1702(a), 40CFR 52.21)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-FINALSEALER EMISSION UNIT CONDITIONS

DESCRIPTION

Sealers are applied to auto bodies manually and robotically. Sealer is air cured and the exhaust is vented in the plant.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

 The VOC content of each final sealer and adhesive, as applied, shall be determined using federal Reference Test Method 24 at representative time(s) and temperature(s) used to cure the related coating or material in practice as provided by ASTM D2369-98, 1.4 and Note 3. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content of each sealer and adhesive shall be verified by testing at owner's expense.² (R336.1205, R336.1224, R336.1225, R336.1702(a), 40 CFR 52.21)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-GASFILL EMISSION UNIT CONDITIONS

DESCRIPTION

Fuel is dispensed into the vehicle tank and vapors from the filling operations are controlled via on-board refueling vapor recovery (ORVR).

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT

ORVR

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

 The assembly line gasoline dispensing station shall be controlled by a Stage II vapor balance system or an equivalent system unless filled vehicles are equipped with on-board refueling vapor recovery (ORVR).² (R336.1702(a), R336.1703)

V. TESTING/SAMPLING

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

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

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

- 2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-WINDSHIELDFILL EMISSION UNIT CONDITIONS

DESCRIPTION

Windshield fluid fill station.

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

 The VOC content, water content and density of any material as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any material shall be verified using federal Reference Test Method 24.² (R 336.1220(a), R 336.2040, R 336.2041)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-LOWBAKE EMISSION UNIT CONDITIONS

DESCRIPTION

Blemished areas on finished vehicles are repaired in booths. This includes any preparations such as sanding. The blemished area is painted and cured in booths. Stacks are used for exhaust.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

Dry filters.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall operate the coating spray booths with the dry filters installed and operating properly.² (R336.1205, R336.1220, R336.1702(a))

V. TESTING/SAMPLING

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

 The VOC content, water content and density of any low bake material as applied and as received, shall be determined using federal Reference Test Method 24. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24.² (R336.1205, R336.1224, R336.1225, R336.1702(a), 40 CFR 52.21)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 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. SVST-AS-076	34 ²	58 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
2. SVST-AS-077	342	58 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
3. SVST-AS-078	342	58 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
4. SVST-AS-079	342	58 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
5. SVST-AS-080	342	58 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
6. SVST-AS-082	54 ²	58 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-WIPE EMISSION UNIT CONDITIONS

DESCRIPTION

Auto bodies are manually wiped with solvents during different phases of painting and assembly. The emissions are vented into the plant or through a stack.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

 The VOC content, water content and density of any solvent as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any material shall be verified using federal Reference Test Method 24.² (R 336.1220(a), R 336.2040, R 336.2041)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-PURGE EMISSION UNIT CONDITIONS

DESCRIPTION

Purge and non-production solvents associated with EU-TOPCOAT1, EU-TOPCOAT2, and EU-TOPCOAT3.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

 The VOC content, water content and density of any solvent as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any material shall be verified using federal Reference Test Method 24. (R 336.1220(a), R 336.2040, R 336.2041)

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-BOILER1 EMISSION UNIT CONDITIONS

DESCRIPTION

Hot water is generated for plant use in Natural Gas Boiler No. 1. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust from the boiler.

Flexible Group IDs: FG-FACILITY, FG-BOILER-MACT

POLLUTION CONTROL EQUIPMENT

Low-NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

Pollu	tant	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA		NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-BOILER1 unless both the flue gas re-circulation system and the low NOx burners are installed and operating properly.² (R336.1910)
- The permittee shall burn only natural gas or virgin distillate oil, hereinafter "No. 2 fuel oil," in EU-BOILER1. "Virgin oil" is defined in the context of this permit as fuel oil originating from a petroleum refinery and has not been adulterated by the addition of any amount of used oils, off specification oils, waste oils, recycled oils, or hazardous substances.² (R336.1205)
- 3. The permittee shall not fire natural gas and No. 2 fuel oil simultaneously in EU-BOILER1 except during changeover between fuels and shall start up each boiler with natural gas prior to firing with No. 2 fuel oil, if natural gas is available during startup.² (R336.1205)

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. <u>REPORTING</u>

- 1. 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))
- 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. SVST-EC-001	45 ²	75 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-BOILER2 EMISSION UNIT CONDITIONS

DESCRIPTION

Hot water is generated for plant use in Natural Gas Boiler No. 2. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust from the boiler.

Flexible Group IDs: FG-FACILITY, FG-BOILER-MACT

POLLUTION CONTROL EQUIPMENT

Low NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

Pollu	tant	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA		NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-BOILER2 unless both the flue gas re-circulation system and the low NOx burners are installed and operating properly.² (R336.1910)
- The permittee shall burn only natural gas or virgin distillate oil, hereinafter "No. 2 fuel oil," in EU-BOILER2. "Virgin oil" is defined in the context of this permit as fuel oil originating from a petroleum refinery and has not been adulterated by the addition of any amount of used oils, off specification oils, waste oils, recycled oils, or hazardous substances.² (R336.1205)
- 3. The permittee shall not fire natural gas and No. 2 fuel oil simultaneously in EU-BOILER2 except during changeover between fuels and shall start up each boiler with natural gas prior to firing with No. 2 fuel oil, if natural gas is available during startup.² (R336.1205)

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. <u>REPORTING</u>

- 1. 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))
- 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. SVST-EC-002	45 ²	75 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-BOILER3 EMISSION UNIT CONDITIONS

DESCRIPTION

Hot water is generated for plant use in Natural Gas Boiler No. 3. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust from the boiler.

Flexible Group IDs: FG-FACILITY, FG-BOILER-MACT

POLLUTION CONTROL EQUIPMENT

Low NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

Pollu	tant	Limit	Time Period/ Operating Scenario		Monitoring/ Testing Method	Underlying Applicable Requirements
NA		NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-BOILER3 unless both the flue gas re-circulation system and the low NOx burners are installed and operating properly.² (R336.1910)
- The permittee shall burn only natural gas or virgin distillate oil, hereinafter "No. 2 fuel oil," in EU-BOILER3. "Virgin oil" is defined in the context of this permit as fuel oil originating from a petroleum refinery and has not been adulterated by the addition of any amount of used oils, off specification oils, waste oils, recycled oils, or hazardous substances.² (R336.1205)
- 3. The permittee shall not fire natural gas and No. 2 fuel oil simultaneously in EU-BOILER3 except during changeover between fuels and shall start up each boiler with natural gas prior to firing with No. 2 fuel oil, if natural gas is available during startup.² (R336.1205)

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. <u>REPORTING</u>

- 1. 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))
- 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. SVST-EC-003	45 ²	75 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EU-BOILER4 EMISSION UNIT CONDITIONS

DESCRIPTION

Hot water is generated for plant use in Natural Gas Boiler No. 4. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust from the boiler.

Flexible Group IDs: FG-FACILITY, FG-BOILER-MACT

POLLUTION CONTROL EQUIPMENT

Low NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall not operate EU-BOILER4 unless both the flue gas re-circulation system and the low NOx burners are installed and operating properly. (R336.1910)
- The permittee shall burn only natural gas or virgin distillate oil, hereinafter "No. 2 fuel oil," in EU-BOILER4. "Virgin oil" is defined in the context of this permit as fuel oil originating from a petroleum refinery and has not been adulterated by the addition of any amount of used oils, off specification oils, waste oils, recycled oils, or hazardous substances. (R336.1205)
- 3. The permittee shall not fire natural gas and No. 2 fuel oil simultaneously in EU-BOILER4 except during changeover between fuels and shall start up each boiler with natural gas prior to firing with No. 2 fuel oil, if natural gas is available during startup. **(R336.1205)**

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. <u>REPORTING</u>

- 1. 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))
- 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. SVST-EC-004	45 ²	100 ²	R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-FACILITY	This flexible group covers all equipment used for automotive assembly and painting operations for the Jefferson North Assembly Plant.	All EU's and FG's in this permit.
FG-CONTROLS	VOC concentrators and regenerative thermal oxidizers used for control of VOC emissions from the paint spray booths and curing ovens (excluding guidecoat cure oven).	All emission units and flexible groups associated with automotive assembly and painting operations with VOC controls including: EU-ECOAT, EU- TOPCOAT1, EU- TOPCOAT2, and EU- TOPCOAT3.
FG-AUTO-MACT	Each new, reconstructed, or existing affected source as defined in 40 CFR 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c) is subject to the requirements of 40 CFR 63 Subpart IIII. This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.	EU-SEALERS EU-ECOAT EU-GUIDECOAT EU-TOPCOAT1 EU-TOPCOAT2 EU-TOPCOAT3 EU-TOUCHUP EU-FINALSEALER EU-WINDSHIELDFILL EU-LOWBAKE EU-WIPE EU-PURGE

Flexible Group ID	Flexible Group Description	Associated
		Emission Unit IDs
FG-OLD-MACT	The affected source is each new, reconstructed, or existing Organic Liquid Distribution (OLD) (non- gasoline) operation that is located at, or is part of a major source of hazardous air pollutant (HAP) emissions. The affected source is comprised of storage tanks, transfer racks, equipment leak components associated with storage tanks, transfer racks and pipelines, transport vehicles, and all containers while loading or unloading at transfer racks subject to this subpart. Equipment that is part of an affected source under another NESHAP is excluded from the affected source. (40 CFR 63.2338(c))	EU-METHANOLTANK
	These conditions specifically cover existing (construction pre dates April 2, 2002) liquid storage tanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles.	
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EU-COLDCLEANER
FG-RULE287(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c).	EU-RULE287(c)
FG-RULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	EU-RULE290
FG-BOILER-MACT	This Flexible Group establishes the national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP as found in 40 CFR Subpart DDDDD.	
FG-CI-RICE-MACT	40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition RICE less than 500 bhp.	EU-ENG-EFP EU-ENG-WFP

FG-FACILITY FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group covers all equipment used for automotive assembly and painting operations for the Jefferson North Assembly Plant.

Emission Units: All emission units and flexible groups associated with automotive assembly and painting operations. This includes clean up and purge activities, storage tanks, boilers, and paint sludge handling and disposal operations. Additionally, this includes but is not limited to the following emission units: EU-PMRCOLDCLEANER, EU-GRINDING, EU-SEALERS, EU-ECOAT, EU-GUIDECOAT, EU-TOPCOAT1, EU-TOPCOAT2, EU-TOPCOAT3, EU-TOUCHUP, EU-FINAL SEALER, EU-GAS FILL, EU-WINDSHIELDFILL, EU-LOWBAKE, EU-WIPE, EU-PURGE, EU-TF-O-004, EU-TF-O-005, EU-TF-O-006, EU-BOILER1, EU-BOILER2, EU-BOILER3, EU-BOILER4, EU-COLDCLEANER, EU-RULE287(c)), EU-RULE 290, EU-ENG-EFP, EU-ENG-WFP

POLLUTION CONTROL EQUIPMENT

Three VOC concentrators to control clearcoat booths, basecoat booths, and basecoat flash. Eight thermal oxidizers to control e-coat oven, clearcoat booths, basecoat booths, basecoat flash, topcoat ovens. A waterwash system used to control particulate from three topcoat lines. All vehicles are equipped with an ORVR system to control the gasoline filling operations. Dry filtration is used to control particulate emissions from the color prep booths, the welding, grinding, sanding operations and the low bake/spot repair operations.

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	1085.8 tpy ²	12-month rolling time period.	FG-FACILITY	SC VI.1	R 336.1225, R 336.1702(a), 40 CFR 52.21
2. VOC	4.8 lbs per job ^{2,a}	12-month rolling time period.	FG-FACILITY	SC VI.1	R 336.1225, R 336.1702(a), 40 CFR 52.21
3. PM 10	42.4 tpy ²	12-month rolling time period.	FG-FACILITY	SC V.1, SC V.2 and SC VI.1	R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
4. NOx	153.9 tpy ²	12-month rolling time period.	FG-FACILITY		R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
5. CO	133.65 tpy ²	12-month rolling time period.	FG-FACILITY	SC V.4 and SC VI.1	R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
6. SO2	3.4 ² tpy	12-month rolling time period.	FG-FACILITY	SC VI.1	R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

^a In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined VOC emission limit shall be considered compliance with the VOC emission limit established by **R 336.1225**, **R 336.1702(a) and 40 CFR 52.21** and also compliance with the VOC emissions limit in **40 CFR 60.392**, an additional applicable requirement that has been subsumed within this condition.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural gas	3,719.7 MM cubic feet ²	12-month rolling time period	FG-FACILITY	SC VI.1	R336.1205(1)(a)
2. No. 2 fuel oil	160,340 gallons ²	12-month rolling time period	FG-FACILITY	SC VI.1	R336.1205(1)(a)
3. Sulfur content of the No. 2 fuel oil	0.3% by weight ²	Instantaneous	FG-FACILITY	SC VI.1	R336.1401

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

 The permittee shall equip and maintain each spray coating or scuff booth operation which directly vents to the outdoor air with water wash particulate controls unless another particulate control technology is specified.² (R 336.1301, R 336.1331)

V. TESTING/SAMPLING

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

- 1. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable performance test remains valid and representative, the permittee shall verify NOx emission rates from natural gas combustion in a single representative boiler by testing at owner's expense, in accordance with Department requirements. This testing shall consist of three sample runs. For the other three boilers, the permittee shall perform a single sample run to confirm that the NOx emissions are similar to those from the boiler on which the three sample runs were taken. If the single sample run does not show the NOx emissions to be similar, the permittee shall perform three sample runs on the boiler in question. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (R 336.1205, R 336.2001, R 336.2003, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))
- 2. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable performance test remains valid and representative, the permittee shall verify CO emission rates from natural gas combustion in a single representative boiler by testing at owner's expense, in accordance with Department requirements. This testing shall consist of three sample runs. For the other three boilers, the

permittee shall perform a single sample run to confirm that the CO emissions are similar to those from the boiler on which the three sample runs were taken. If the single sample run does not show the CO emissions to be similar, the permittee shall perform three sample runs on the boiler in question. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (R 336.1205, R 336.2001, R 336.2003, R 336.2004, R 336.2804, 40 CFR 52.21(c) & (d))

- 3. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable performance test remains valid and representative, the permittee shall verify the transfer efficiency of one representative Basecoat line, and one representative Clearcoat line, capture efficiency across one representative Topcoat line for both the booth and curing oven portions, and the destruction efficiency of all thermal oxidizers, and removal efficiency of all concentrators, by in-plant testing at owner's expense, in accordance with Department requirements, 40 CFR 51 Appendix M, and the USEPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA-453/R-08-002, as amended will be required. No less than 60 days prior to testing, a complete testing plan shall be submitted to the AQD District Supervisor. This testing plan must be approved by the Department prior to testing. A complete report of test results must be submitted to the District Supervisor within 60 days following the testing.² (R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)
- 4. The permittee shall conduct an analysis for EU-ECoat as found in Appendix 5. (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 keep the following records/calculations in a format acceptable to the AQD District Supervisor. The permittee shall compile all required records and complete all required calculations and make them available within 30 days following the end of each calendar month for which records are required to be kept.
 - a. For each material used in FG-FACILITY:^b
 - i. Material identification;
 - ii. Material VOC content; and,
 - iii. Material usage.
 - b. Number of jobs each calendar month, where a job is defined as a painted vehicle leaving the assembly line.^b
 - c. Calculations showing the FG-FACILITY monthly and annual mass VOC emission rates, in tons per month and tons per 12-month rolling time period, as determined at the end of each calendar month. Calculations must show the capture and control efficiency of each control device used. Calculations must also include a sample calculation based on the production of a single job and that specifies all measured or assumed process parameters (e.g., transfer, capture and control efficiencies, booth splits, etc.) and VOC emissions due to natural gas combustion, purge and cleanup operations, storage tanks, and paint sludge handling and disposal operations. Prior to the initial testing, for each controlled section, the design combined capture and control efficiency may be used. Thereafter, values no greater than the most recently tested values may be used.^b
 - d. Calculations showing the VOC emission rate (lb/job) on a 12-month rolling basis, as determined at the end of each calendar month for the equipment covered by FG-FACILITY.^b
 - e. Calculations showing the PM-10 mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY. Prior to the testing required in SC V.1 and SC V.2 being completed, these calculations shall be performed according to a method acceptable to the AQD District Supervisor. After the testing required in SC V.1 and SC V.2 is completed, the PM-10 emission factors measured during the test shall be used to perform these calculations.
 - f. Calculations showing the NOx mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY. Prior to the testing required

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in SC V.3 being completed, AP-42 emission factors shall be used to perform these calculations. After the testing required in SC V.3 is completed, the NOx emission factors measured during the test shall be used to perform these calculations.

- g. Calculations showing the CO mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY. Prior to the testing required in SC V.4 being completed, AP-42 emission factors shall be used to perform these calculations. After the testing required in SC V.4 is completed, the CO emission factors measured during the test shall be used to perform these calculations.
- h. Calculations showing the SO2 mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY.
- i. Records of the total natural gas used during each calendar month and 12-month rolling time period, in cubic feet.
- j. Records of the total No. 2 fuel oil combusted in EU-BOILER1, EU-BOILER2, EU-BOILER3, and EU-BOILER4 during each calendar month and 12-month rolling time period, in gallons. Also, records of the sulfur content, in percent by weight, of all No. 2 fuel oil used.
- k. Hours of operation for each calendar month and 12-month rolling time period.

All records/calculations shall be kept on file for a period of at least five years and made available to the Department upon request.^{2,b} (R 336.1225, R 336.1702(a))

- 2. The permittee shall monitor the condition of each particulate control system through weekly visual inspections. The permittee shall keep records of visual inspections of each exhaust filter or water wash particulate control system which include the dates and results of the inspections, and the dates and reasons for repairs. All records shall be kept on file for a period of at least five years and made available to the Department upon request.² (R 336.1301, R 336.1331)
- The permittee shall maintain a record of the projects authorized by SC IX.3 and IX.4. This includes, at a minimum, maintaining documentation of testing and monitoring for each project demonstrating compliance with the applicable emission limits in SC I.1 through 6. All records shall be kept on file in a format acceptable to the District Supervisor and made available to the Department upon request.² (R 336.1220(a), R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))

See Appendix 7

VII. <u>REPORTING</u>

- 1. 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)
- 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))

^b In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined VOC monitoring condition shall be considered compliance with the VOC monitoring condition established by **R 336.1225 and R 336.1702(a);** and also compliance with the VOC monitoring conditions in **40 CFR 60.393**, an additional applicable requirement that has been subsumed within this condition.

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- 4. For each emission unit (EU) and flexible group (FG) included in this permit, the permittee shall submit to the AQD District Supervisor, in an acceptable format, within 30 days following the end of the quarter in which the data was collected, the actual VOC, PM-10, NOx, CO, and SO2 emission rates for each limit included in the permit.² (R 336.1205, R 336.1220(a))
- 5. The permittee shall notify the AQD District Supervisor, in writing, of projects authorized by SC IX.3 and 4 at least 30 days prior to initialization of the activity. The notification shall include, at a minimum, a description of the type of project and any changes in testing, monitoring, recordkeeping or other compliance evaluation activities.² (R 336.1201)

See Appendix 8

^c In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined reporting condition shall be considered compliance with the reporting condition established by **R 336.1213(3)(c)(i)**; and also compliance with the VOC reporting condition in **40 CFR 60.395**, an additional applicable requirement that has been subsumed within this condition.

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

- 1. This permit covers automotive assembly and painting operations. Changes to these operations or replacement with a different process type are subject to the requirements of R 336.1201, except as disallowed by R 336.1278 or as allowed by R 336.1279 through R 336.1290 or SC IX.3 or 4.2 (R 336.1201)
- MDEQ has determined that compliance with the limits listed in SC I.1 through 2 provides a level of control that is at least equivalent to and not less stringent than the standards in 40 CFR 60.392, *et seq.* Accordingly, compliance with the limitations in this permit meets all applicable requirements of 40 CFR Part 60, Subpart MM.² (40 CFR 60, Subpart MM)
- 3. This permit authorizes any activities including projects involving physical changes or changes in the method of operation to existing emission units that do not require an increase in the emissions limits or performance levels specified in SC I.1 through 6. Such activities do not require the facility to obtain any federal or state air permits.² (R 336.1201)
- 4. This permit authorizes projects involving the installation of new emission units that do not require an increase in the emissions limits or performance levels specified in SC I.1 through 6 under the following conditions:
 - a. As a state-only enforceable requirement, the new emission unit will not result in a meaningful change in the nature or quantity of toxic air contaminants emitted from the stationary source. The permittee must demonstrate to the department by testing or calculations that a meaningful change in the nature or quantity of toxic air contaminants has not occurred. The permittee may devise its own method to perform this demonstration subject to approval by the department. However, if the permittee demonstrates that all toxic

air contaminant emissions from a new emissions unit are within the levels specified in R 336.1226 or R 336.1227, a meaningful change in toxic air contaminants has not occurred;

- b. The new emissions unit will not be a newly constructed or reconstructed major source of hazardous air pollutants as defined in and subject to 40 C.F.R. §63.2 and §63.5(b)(3), National Emission Standard for Hazardous Air Pollutants; and,
- c. The installation of the new emissions unit will not cause the violation of any applicable air requirement.

A demonstration that the new installation meets these criteria shall be kept on site for the life of the new emissions unit and made available to the department upon request. The permittee must notify the department of the installation of the new emission unit. This notification must contain the information specified in R 336.1215(3)(c)(i) through (v). Construction of the new emission unit may commence upon submittal of the notice.² (R 336.1201)

- 5. The emission limits and performance levels specified in SC I.1 through 6 may be reviewed and or adjusted when newly applicable federal requirements or any other requirement that is enforceable as a practical matter and that the department, under its State Implementation Plan, may impose on the facility become applicable during the term of the permit that would lower allowable emissions. Adjustments to SC I.1 through 6 will be made through a permit revision as of the effective date of the new applicable requirements and will reflect the impact the new applicable requirements will have on the affected emission units. Initial compliance with the adjusted emission limits and performance levels will be demonstrated over the initial compliance period granted by the newly applicable federal requirement.² (R 336.1225, R 336.1702(a))
- 6. The permittee may, at any time, request that MDEQ terminate the flexible emission limit provisions of this permit and issue a traditional permit. In the event of such termination, the requirements of this permit shall remain in effect until a new permit is issued. At that time, the permit conditions for any existing emission unit that has not been modified and to which new requirements have not become applicable will revert to those found in the previous permits. For any new or modified emission unit, or any emission unit for which new requirements have become applicable the permit conditions will reflect requirements contemporaneous with the date of installation, modification or new requirement applicability.² (R 336.1225, R 336.1702(a))

Footnotes:

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

FG-CONTROLS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

VOC concentrators and regenerative thermal oxidizers used for control of VOC emissions from the paint spray booths and curing ovens (except guidecoat cure ovens).

Emission Units: All emission units and flexible groups associated with automotive assembly and painting operations with VOC controls including: EU-ECOAT, EU-TOPCOAT1, EU-TOPCOAT2, and EU-TOPCOAT3.

POLLUTION CONTROL EQUIPMENT

VOC concentrators and regenerative thermal oxidizers used for control of VOC emissions from portions of the painting operations and curing ovens (except guidecoat cure ovens).

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

 Within 90 days of issuance of this permit, the permittee shall develop, maintain and implement an Operation and Maintenance Plan (O & M Plan) for FG-CONTROLS. The O & M Plan shall contain the minimum requirements as outlined in Appendix 3. The O & M Plan shall be updated as necessary to reflect changes in equipment and monitoring, to implement corrective actions and to address malfunctions. Changes in the O & M Plan as outlined in Appendix 3 shall be submitted to the AQD District Supervisor for review and approval. All records and activities associated with the O & M Plan shall be made available to the Department upon request.² (R 336.1220(a), R 336.1910, 64.6(c)(1)(i),(ii), 64.7(e))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

- The permittee shall install, maintain and operate in a satisfactory manner, combustion chamber temperature monitoring devices for the thermal oxidizers in FG-CONTROLS to monitor and record the temperature on a continuous basis during operation. Temperature data recording shall consist of measurements made at equally spaced intervals at least once every 15 minutes. All records shall be kept on file and made available to the Department upon request.^a (R 336.1220(a), R 336.1910, 40 CFR 64.6(c)(1)(i),(ii))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, temperature monitoring devices for the VOC concentrators in FG-CONTROLS to monitor and record the desorption gas inlet temperature on a continuous basis during operation. Desorption gas inlet temperature data recording shall consist of measurements made at equally spaced intervals at least once every 15 minutes. All records shall be kept on file and made available to the Department upon request.^a (R 336.1220(a), R 336.1910, 40 CFR 64.6(c)(1)(i),(ii))
- 3. The permittee shall maintain records of maintenance and repair activities. Records shall identify the equipment inspected and the date of the inspection. The permittee shall also record any maintenance activities or corrective actions taken as a result of equipment inspections or due to malfunction. All records shall be kept on file and made available to the Department upon request. (R 336.1910, 40 CFR 64.6(c)(1)(i),(ii))
- 4. For each control device in operation during production (coating vehicles), the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass line was open shall be kept on file. (40 CFR 64.3(a)(2))
- 5. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). (40 CFR 64.7(d))
- 6. 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 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), 64.7(c))
- 7. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. (40 CFR 64.7(b))

See Appendix 3

^a In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined monitoring condition shall be considered compliance with the monitoring condition established by **R 336.1220(a)**, **R 336.1910 and 40 CFR 64.6(c)(1)(i),(ii)**; and also compliance with the monitoring conditions in **40 CFR 60.394**, an additional applicable requirement that has been subsumed within this condition.

VII. <u>REPORTING</u>

- 1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. (40 CFR 64.9(a)(2)(i))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

- 1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: (64.6(c)(2))
 - a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special conditions
 - b. A monitoring excursion is defined as a failure to properly monitor as required in special conditions VI.1, VI.2 and VI.3.
 - c. A monitoring excursion is defined as failure to properly implement and/or maintain the O&M plan required in special condition III.1.
- 2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR Part 64)
- 3. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM requirements within the O&M Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))

Footnotes:

FG-AUTO-MACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each new, reconstructed, or existing affected source as defined in 40 CFR 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c) is subject to the requirements of 40 CFR 63 Subpart IIII. This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.

Emission Unit: All emission units and flexible groups associated with automotive assembly and painting operations including: EU-SEALERS, EU-ECOAT, EU-GUIDECOAT, EU-TOPCOAT1, EU-TOPCOAT2, EU-TOPCOAT3, EU-TOUCHUP, EU-FINALSEALER, EU-WINDSHIELDFILL, EU-LOWBAKE, EU-WIPE and EU-PURGE

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	' Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.60 lb per GACS	Calendar month	EUECOAT, EUGUIDECOAT, EUTOPCOAT1, EUTOPCOAT2, EUTOPCOAT3, EUTOUCHUP, EULOWBAKE, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations in the Paint Shop.	SC III.3, SC V.1, SC VI.3	40 CFR 63.3091(a)
2. Organic HAP	1.10 lbs per GACS*	Calendar month	EUGUIDECOAT, EUTOPCOAT1, EUTOPCOAT2, EUTOPCOAT3, EUTOUCHUP, EULOWBAKE, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations in the Paint Shop.	SC III.3, SC V.1, SC VI.3	40 CFR 63.3091(b)
3. Organic HAP	0.01 lb per lb of coating	Calendar month	NGB Adhesives and Sealers that are not components of glass bonding systems.	SC III.3, SC V.1, SC VI.3	40 CFR 63.3090(c) or 63.3091(c)
4. Organic HAP	0.01 lb per lb of coating	month	DEADENERS	Condition Nos. III.2, V.1 & VI.3	40 CFR 63.3090(d) or 63.3091(d)

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

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

- a. Each individual material added to EU-ECOAT contains no more than 1.0 percent by weight of any organic HAP and no more than 0.10 percent by weight of any OHSA-defined carcinogenic organic HAP; or,
- b. The emissions from all EU-ECOAT bake ovens are captured and ducted to the oven thermal oxidizer which achieves a minimum destruction efficiency of at least 95 percent (by weight).

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which an emission limit has been established under SC I.1 through 4. The work practice plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented consistent with the requirements of 40 CFR 63.3094. The permittee shall comply with the applicable work practice plans at all times.²
 - a. All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.
 - b. Spills of organic-HAP containing coatings, thinners, cleaning materials, and waste materials must be minimized.
 - c. Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
 - d. Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
 - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.
 - f. Organic HAP emissions from cleaning and from purging of equipment associated with all coating operations subject to emission limits in SC I.1 through 4 above must be minimized by addressing:
 - i. Vehicle body wipe pursuant to 40 CFR 63.3094(c)(1)(i);
 - ii. Coating line purging pursuant to 40 CFR 63.3094(c)(1)(ii);
 - iii. Coating system flushing pursuant to 40 CFR 63.3094(c)(1)(iii);
 - iv. Cleaning of spray booth grates pursuant to 40 CFR 63.3094(c)(1)(iv);
 - v. Cleaning of spray booth walls pursuant to 40 CFR 63.3094(c)(1)(v);
 - vi. Cleaning of spray booth equipment pursuant to 40 CFR 63.3094(c)(1)(vi);
 - vii. Cleaning of external spray booth areas pursuant to 40 CFR 63.3094(c)(1)(vii);
 - viii. Additional housekeeping measures pursuant to 40 CFR 63.3094(c)(1)(viii).

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g).² (40 CFR 63.3100(c), 40 CFR 63.4493(b) and (c))

- 2. The work practice plan shall not become part of the facility's Renewable Operating Permit. Revisions to the work practice plan likewise do not represent revisions to the facility's Renewable Operating Permit. Copies of the current work practice plan and any earlier plan developed within the past five years are required to be made available for inspection and copying by the Air Quality Division upon request.² (40 CFR 63.3094)
- 3. For any coating operation(s) for which HAP emission reductions due to the use of add-on control equipment are relied upon to demonstrate compliance with the emission limits in SC I.1 through 4 above, the permittee shall meet the operating limits specified in Table 1 of 40 CFR 63 Subpart IIII as identified below. The operating limits in Table 1 apply to the emission capture and add-on control systems on the coating operations. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3167. The operating limits shall be met at all times after they are established, except for periods of startup, shutdown and malfunction.² (40 CFR 63.3093, 40 CFR 63.3100(b), (d) and Table 1)

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

- 4. The permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) in accordance with 40 CFR 63.6(e)(3). This plan must address the startup, shutdown and corrective actions in the event of a malfunction of any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.² (40 CFR 63.3100(f))
- 5. The permittee shall operate and maintain FG-AUTO-MACT including any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, according to the provisions in 40 CFR 63.6(e)(1)(i).² (40 CFR 63.3100(d))
- 6. The permittee shall maintain a log detailing the operation and maintenance of any emission capture system, add-on control device, or continuous parameter monitor upon which compliance with any of the emission limits in SC I.1 through 4 depends. The log shall cover the period between the compliance date specified in 40 CFR 63.3083 and the date when the initial emission capture system and add-on control device performance tests have been completed, as specified in 40 CFR 63.3160.² (40 CFR 63.3100(e))

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

NA

V. TESTING/SAMPLING

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

1. The permittee shall perform the applicable performance tests and compliance demonstrations in accordance with 40 CFR 63.3150-3152, 40 CFR 63.3160-3161, 40 CFR 63.3163-3168, 40 CFR 63.3170-3171, and 40 CFR 63.3173.² (40 CFR Part 63, Subpart IIII)

- 2. The permittee may rely upon the results of capture, destruction or transfer efficiency tests that have been previously conducted upon written approval from the AQD District Supervisor. Any such previous tests must meet the criteria identified in 40 CFR 63.3160(c)(1) through (3).² (40 CFR 63.3160)
- 3. The permittee shall determine the mass fraction of each organic HAP for each material used according to the procedures established under 40 CFR 63.3151(a)(1) through (5). The permittee may use USEPA Method ALT-017 as an alternative for any material used, after demonstrating that its use as an alternative test methodology for that material, has been approved by the USEPA pursuant to the requirements of 40 CFR 63.3151(a)(3) and 40 CFR 63.7.² (40 CFR 63.7, 40 CFR 63.3151)

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 compile all required records and complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the end of the calendar month following each compliance period unless otherwise specified in any monitoring/recordkeeping condition.² (R 336.1213(3))
- The permittee shall conduct an initial compliance demonstration for the initial compliance period described in 40 CFR 63.3150-3151, 40 CFR 63.3160-3161, and 40 CFR 63.3170-3171. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3083 and ends on the last day of the month following the compliance date. If the initial date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next month.² (40 CFR 63.3150, 40 CFR 63.3160, 40 CFR 63.3170, 40 CFR 63.3083(a) and (b))
- 3. The permittee shall install, operate and maintain each continuous parametric monitoring system in accordance with the applicable provisions of 40 CFR 63.3168.² (40 CFR 63.3168)
- 4. The permittee shall keep all records as required by 40 CFR 63.3130 in the format and timeframes outlined in 40 CFR 63.3131.² (40 CFR 63.3130, 40 CFR 63.3131)
- 5. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date:
 - A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart IIII and the documentation supporting each notification and report as specified in 40 CFR 63.3130(a).² (40 CFR 63.3130(a))
 - b. A current copy of information provided by materials suppliers or manufactures, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP for each coating, thinner and cleaning material, the density for each coating and thinner, and the volume fraction of coating solids for each coating. **(40 CFR 63.3130(b))**
 - c. Monthly records of the following:
 - i. For each coating or thinner used in FG-AUTO-MACT, the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids. (40 CFR 63.3130(c))
 - ii. For each material used in EU-DEADENER and EU-SEALERS, the mass used in each month and the mass organic HAP content. (40 CFR 63.3130(c))
 - iii. Calculations of the organic HAP emission rate for FG-AUTO-MACT in pounds per gallon of applied coating solids. If permittee chooses to comply with the option identified in SC I.5.a., a record of the weight fraction of each organic HAP in each material added to EU-ECOAT. These calculations and records must include all raw data, algorithms, and intermediate calculations. If the "Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-453/R-08-002, is used, all data input to this must be recorded. If these data are maintained as electronic files, the electronic files, as well as any paper copies must be maintained. (40 CFR 63.3130(c), 40 CFR 63.3163, 40 CFR 63.3173)
 - iv. Calculation of the average monthly mass organic HAP content in pounds per pound of coating, separately for EU-DEADENER and EU-SEALERS. (40 CFR 63.3130(c), 40 CFR 63.3152)

- v. The name, volume, mass fraction organic HAP content and density of each cleaning material used. (40 CFR 63.3130(d) (f))
- d. Any additional records pertaining to deviations; startup, shutdown or malfunctions; emission capture systems; performance testing; capture and control efficiency determinations; transfer efficiency determinations; and work practice plans for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, pursuant to 40 CFR 63.3130(g) through (n).² (40 CFR 63.3130(g) (n))
- e. Records pertaining to the design and operation of control and monitoring systems for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends must be maintained on-site for the life of the equipment in a location readily available to plant operators and inspectors.² (40 CFR 63.3130(o))
- 6. The permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 to Subpart IIII of Part 63 for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, pursuant to 40 CFR 63.3163 and 40 CFR 63.3173 using the method(s) described below:² (40 CFR 63.3163, 40 CFR 63.3173 and Table 1)

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

- 7. The permittee shall monitor or secure the valve or closure mechanism controlling each bypass line for each capture system upon which compliance with any of the emission limits in SC I.1 through 4 depends in a non-bypass mode such that the valve or closure mechanism cannot be opened without creating a record that it was opened. The method used to monitor or secure the valve or closure mechanism must meet one of the following:
 - a. Flow control position indicator requirements pursuant to 40 CFR 63.3168(b)(1)(i);
 - b. Car-seal or lock-and-key valve closures requirements pursuant to 40 CFR 63.3168(b)(1)(ii);
 - c. Valve closure monitoring requirements pursuant to 40 CFR 63.3168(b)(1)(iii);
 - d. Automatic shutdown system requirements pursuant to 40 CFR 63.3168(b)(1)(iv).

If any bypass line is opened, a description of why the line was opened and the length of time it remained open must be included in the semi-annual compliance reports required in SC VII.1.² (40 CFR 63.3168(b))

VII. <u>REPORTING</u>

1. 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))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.3120(a). The first time period covered by these reports shall be shortened so as to end on either June 30 or December 31, whichever comes first. These reports shall be due March 15 for the reporting period July 1 to December 31 and September 15 for the reporting period January 1 to June 30.² (40 CFR 63.3120(a))
- 5. The permittee shall submit applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), as specified in 40 CFR 63.3110.² (40 CFR Part 63, Subparts A and IIII)
- 6. For any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, the permittee shall submit all performance test reports for emission capture systems and add-on control devices, and reports of transfer efficiency tests as required by 40 CFR 63.3120(b).² (40 CFR 63.3120(b))
- For any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, for which a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSMP report as specified in 40 CFR 63.3120(c).² (40 CFR 63. 3120(c), 40 CFR 63.10(d))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart IIII for Surface Coating of Automobiles and Light Duty Trucks by the initial compliance date.² (40 CFR Part 63, Subparts A and IIII)

Footnotes:

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

FG-OLD-MACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The affected source is each new, reconstructed, or existing Organic Liquid Distribution (OLD) (non-gasoline) operation that is located at, or is part of a major source of hazardous air pollutant (HAP) emissions. The affected source is comprised of storage tanks, transfer racks, equipment leak components associated with storage tanks, transfer racks and pipelines, transport vehicles, and all containers while loading or unloading at transfer racks subject to this subpart. Equipment that is part of an affected source under another NESHAP is excluded from the affected source. **(40 CFR 63.2338(c))**

Emission Unit: EU-METHANOLTANK. These conditions specifically cover existing (construction pre dates April 2, 2002) liquid storage tanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. For each existing storage tank with a capacity greater than 5,000 gallons but less than 50,000 gallons, the permittee shall comply with the requirements of 63.2343(b).² (40 CFR 63.2343(b))
- 2. For each new storage tank with a capacity greater than 5,000 gallons but less than 10,000 gallons, the permittee shall comply with the requirements of 63.2343(b).² (40 CFR 63.2343(b))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. <u>TESTING/SAMPLING</u>

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

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

The permittee shall keep documentation, including a record of the annual average true vapor pressure of the total Table 1 Organic liquid, that verifies the storage tank is not required to be controlled under this subpart. The documentation shall be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review.² (63.2343(b)(3))

VII. <u>REPORTING</u>

- 1. 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))
- The permittee shall submit the following information in either the Notification of Compliance Status, according to the schedule in Table 12 to this subpart, or in your first Compliance report according to the schedule in 63.2386(b), whichever occurs first.² (63.2343(b)(1))
 - a. Company name and address.
 - b. A statement by a responsible official, including the official's name, title and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete.
 - c. Date of report and beginning and ending dates of the reporting period.
 - d. A list of all storage tanks greater than 5,000 gallons that are part of the affected source but not subject to any of the emission limitations, operating limits, or work practice standards of this subpart.
- 5. The permittee shall submit subsequent compliance reports according to the schedule in 63.2386(b) or in conjunction with the reporting requirements in this ROP whenever any of the following events occur as applicable:² (63.2343(b)(2))
 - a. Any storage tank became subject to control under this subpart EEEE.
 - b. Any storage tank greater than 5,000 gallons became part of the affected source, but is not subject to any emission limitations, operating limits or work practice standards of this subpart.

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

	Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA		NA	NA	NA

IX. OTHER REQUIREMENT(S)

FCA US, LLC JEFFERSON NORTH ASSEMBLY PLANT

 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 EEEE as they apply to FG-OLD. The permittee may choose an alternative compliance method not listed in FG-OLD by providing the appropriate notifications required under 40 CFR 63.9(j), maintaining a log required by 40 CFR 70.6(a)(9), and by complying with all applicable provisions required by Subpart EEEE for the compliance option chosen.² (40 CFR Part 70.6(a)(9), 40 CFR Part 63.9(j), 40 CFR Part 63, Subparts A and EEEE)

Footnotes:

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

FG-COLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EU-COLDCLEANER

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))
- 2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(h))
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(r)(iv))
- 2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
- 3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))
- 4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
- 5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))

FCA US, LLC JEFFERSON NORTH ASSEMBLY PLANT

- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- 1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
- 2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
- 3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
- 4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, can evaporate into the atmosphere shall be made monthly. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

VII. <u>REPORTING</u>

- 1. 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)

ROP No: MI-ROP-N2155-2017 Expiration Date: JUNE 9, 2022 PTI No: MI-PTI-N2155-2017

IX. ANOTHER REQUIREMENT(S)

FG-RULE 287(c) FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EU-RULE287(c), EU-MAINTENANCE_BOOTH

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DNRE, AQD Rule 287(c), Permit to Install Exemption Record form (EQP 3562) or an alternative format that is approved by the AQD District Supervisor. (R 336.1213(3))
 - a. Volume of coating used, as applied, minus water, in gallons. (R 336.1287(c)(iii))
 - b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. (R 336.1213(3))

See Appendix 4

VII. <u>REPORTING</u>

- 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))
- 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. ANOTHER REQUIREMENT(S)

FG-RULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EU-RULE290

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

- Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. (R 336.1290(a)(i))
- Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: (R 336.1290(a)(ii))
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively.
 (R 336.1290(a)(ii)(A))
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(a)(ii)(B))
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. (R 336.1290(a)(ii)(C))
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. (R 336.1290(a)(ii)(D))
- Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: (R 336.1290(a)(iii))
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(a)(iii)(A))

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

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the 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(a)(ii) and (iii). (R 336.1213(3))
 - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. (R 336.1213(3), R 336.1290(c))
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. (R 336.1213(3))
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(b), R 336.1213(3))
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (R 336.1213(3))
- 3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating

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

See Appendix 4

VII. <u>REPORTING</u>

- 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)

FG-BOILER-MACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This Flexible Group establishes the national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP as found in 40 CFR Subpart DDDDD.

Emission Units: EU-BOILER1, EU-BOILER2, EU-BOILER3 and EU-BOILER4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall conduct the initial tune-up of the Boilers 1, 2 3 & 4 no later than January 31, 2016, and every five years (no more than 61 months after the previous tune-up) thereafter to demonstrate continuous compliance as specified in 40 CFR 63.7540(a)(10)(i) through (a)(10)(vi). (40 CFR 63.7510(e), 40 CFR 63.7510(e), 40 CFR 63.7510(e))
- For an existing boiler or process heater located at a major source facility, not including limited use units, the permittee must have a one-time energy assessment performed by a qualified energy assessor as required in Table 3 of 40 CRF Part 63, Subpart DDDDD. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. (40 CFR Part 63, Subpart DDDDD, Table 3)
- 3. The permittee, at all times, must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.7500(a)(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semi-annual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. The permittee shall submit compliance reports as required by 40 CFR 63.7550. The first time period covered by these reports shall be shortened so as to end on either June 30 or December 31, whichever date is the first date that occurs at least 180 days (or 1, 2, or 5 years, as applicable, if submitting an annual, biennial, or 5 year compliance report) after the compliance date that is specified for you source in 40 CFR 63.7495. (40 CFR 63.7550)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of 40 CFR Part 63, Subpart DDDDD. (40 CFR Part 63, Subpart DDDDD)

Footnotes:

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

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

FG-CI-RICE-MACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units: EU-ENG-EFP AND EU-ENG-WFP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63 Subpart ZZZZ Table 2c, Item 1)**

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

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

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

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

V. TESTING/SAMPLING

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

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

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

- 1. For each engine in FG-CI-RICE-MACT the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
- 2. For each engine in FG-CI-RICE-MACT the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. (40 CFR 63.6655(f), 40 CFR 63.6660)

VII. <u>REPORTING</u>

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semi-annual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
- 4. Each affected source that has obtained a Title V Renewable Operating Permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. (40 CFR 63.6650(f))
- 5. If you own or operate an emergency stationary RICE with a site rating of more than 100 brake hp that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), you must submit an annual report according to the requirements below and as specified in 40 CFR 63.6650(h):
 - a. The report must contain the following information:
 - i. Company name and address where the engine is located.
 - ii. Date of the report and beginning and ending dates of the reporting period.
 - iii. Engine site rating and model year.
 - iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - v. Hours operated for the purposes specified in §63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(2)(ii) and (iii).
 - vi. Number of hours the engine is contractually obligated to be available for the purposes specified in §63.6640(f)(2)(ii) and (iii).
 - vii. Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report must also

identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

- viii. If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.
- ix. If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.
- b. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.
- c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §63.13. (40 CFR 63.6650(h), 40 CFR 63.6660)

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

 The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. (40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)

Footnotes:

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

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

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

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

APPENDICES

Appendix 1. Abbreviations and Acronyms

Common Acronyms			Pollutant / Measurement Abbreviations		
AQD	Air Quality Division	acfm	Actual cubic feet per minute		
BACT	Best Available Control Technology	BTU	British Thermal Unit		
CAA	Clean Air Act	°C	Degrees Celsius		
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide		
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent		
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot		
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter		
Department/	Michigan Department of Environmental	°F	Degrees Fahrenheit		
department	Quality	gr	Grains		
EU	Emission Unit	ĂАР	Hazardous Air Pollutant		
FG	Flexible Group	Hg	Mercury		
GACS	Gallons of Applied Coating Solids	hr	Hour		
GC	General Condition	HP	Horsepower		
GHGs	Greenhouse Gases	H ₂ S	Hydrogen Sulfide		
HVLP	High Volume Low Pressure*	kW	Kilowatt		
ID	Identification	lb	Pound		
IRSL	Initial Risk Screening Level	m	Meter		
ITSL	Initial Threshold Screening Level	mg	Milligram		
LAER	Lowest Achievable Emission Rate	mm	Millimeter		
MACT	Maximum Achievable Control Technology	MM	Million		
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts		
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds		
MDEQ	Michigan Department of Environmental	NOx	Oxides of Nitrogen		
	Quality	ng	Nanogram		
MSDS	Material Safety Data Sheet	РM	Particulate Matter		
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10		
NAAQS	National Ambient Air Quality Standards		microns in diameter		
NESHAP	National Emission Standard for Hazardous	PM2.5	Particulate Matter equal to or less than 2.5		
	Air Pollutants		microns in diameter		
NSPS	New Source Performance Standards	pph	Pounds per hour		
NSR	New Source Review	ppm	Parts per million		
PS	Performance Specification	ppmv	Parts per million by volume		
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight		
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute		
PTI	Permit to Install	psig	Pounds per square inch gauge		
RACT	Reasonable Available Control Technology	scf	Standard cubic feet		
ROP	Renewable Operating Permit	sec	Seconds		
SC	Special Condition	SO ₂	Sulfur Dioxide		
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant		
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature		
SRN	State Registration Number	THC	Total Hydrocarbons		
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year		
USEPA/EPA	United States Environmental Protection	μg	Microgram		
	Agency	μm	Micrometer or Micron		
VE	Visible Emissions	VOC	Volatile Organic Compounds		
	instars, the pressure measured at the gun air can	yr	Year		

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-FACILITY and FG-CONTROLS.

Elements of an O & M Plan

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

Thermal Oxidizers

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

Regenerative Thermal Oxidizers

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

VOC Concentrator

- 1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
- 2. Perform internal observation of adsorbent materials for contamination and erosion a minimum of once every 18 months.*
- 3. Observe and record the pressure drop across the concentrator a minimum of once every calendar quarter.
- * The requirement to address this issue is satisfied if a performance test (i.e., stack test) has been performed on the control device within the prior 18 month period.

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

By August 1, 2019, the permittee shall provide a proposal for updating the established percentage "split" of EU-ECoat's VOC emissions from the dip tank versus the curing oven which is acceptable to the AQD District Supervisor. The proposal will include a schedule for completing the analysis and employing its results by August 1, 2021. The proposal may consist of stack testing, sampling, laboratory testing, engineering analysis, evaluations performed for other assembly plant facilities or some combination of these or additional methods that are acceptable to the AQD District Supervisor.

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-N2155-2008. 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-N2155-2008 is being reissued as Source-Wide PTI No. MI-PTI-N2155-2017.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

Appendix 7. Emission Calculations

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

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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