Archived: Tuesday, September 19, 2023 11:58:37 AM
From: Jarrett, Stephanie
Sent: Fri, 15 Sep 2023 15:42:47
To: EGLE-ROP Edgerton, Jared (EGLE)
Cc: disbrowm@owensproducts.com
Subject: RE: SRN N5257 – Initial ROP Application
Importance: Normal
Sensitivity: None
Attachments:
ROP_Owens_2023_0831_REV01.pdf

As requested, please find attached the updated electronic version of the initial ROP Application for:

Owens Products, Inc.

1107 Progress Street

Sturgis, Michigan 49091

SRN: **N5257**

The application was revised to include EUAcetoneReclaim on the EU-001 page. The Acetone Reclamation unit is exempt per 285(2)(u). If you need any additional information, please do not hesitate to let me know.

Thank you.

Stephanie

Stephanie A. Jarrett, PE

Fishbeck

w: 248.324.2146

c: 248.417.9425

From: Dean, Amy <aldean@fishbeck.com>
Sent: Thursday, August 31, 2023 4:57 PM
To: EGLE-ROP@michigan.gov
Cc: BrothersM@michigan.gov; Jarrett, Stephanie <sajarrett@fishbeck.com>; Warwick, David <dwarwick@fishbeck.com>; Holmstrom, Jada <jholmstrom@fishbeck.com>; disbrowm@owensproducts.com
Subject: SRN N5257 – Initial ROP Application

Please find the Initial ROP Application for the facility identified below attached to this email.

Owens Products, Inc.

1107 Progress Street

Sturgis, Michigan 49091

SRN: **N5257**

Application documents (including application forms, and supporting documentation) for SRN N5257 are attached to this email. An administratively complete application is due no later than September 14, 2023. Per AQD's Updated Guidance on Electronic Submission (michigan.gov) the electronic submittal should be accepted as the official receipt date. A hard copy of the application with original signature will be delivered to the Kalamazoo District Office on September 1, 2023.

Please confirm receipt of this Initial ROP Application. If you have questions or problems opening the attached files, please contact me or Stephanie Jarrett.

Amy L. Dean | Senior Environmental Specialist

Fishbeck | w: 616.464.3904 | Fishbeck.com

fishbeck
Engineers | Architects | Scientists | Constructors

39500 MacKenzie Drive, Suite 100
Novi, Michigan 48377

248.324.2090 | fishbeck.com

August 31, 2023
Project No. 231461

Monica Brothers
District Supervisor
EGLE
7953 Adobe Road
Kalamazoo, MI 49009

Renewable Operating Permit (ROP) Initial Application
Owens Product, Inc, SRN N5257

Fishbeck has prepared an ROP initial application for Owens Products, Inc. located at 1107 Progress Street, Sturgis, Michigan. The initial application is due no later than September 14, 2023.

This application includes:

- EGLE ROP Initial Application Form EQP 6002
- EGLE ROP Application Additional Information Form AI-001
- PTI 399-93D
- Potential to Emit Calculations
- Nuisance Minimization Plan

An electronic copy of the application and supporting documents will be provided to EGLE, which reduces the EGLE application administrative completeness review to 15 days.

If you have any questions or require additional information, please contact me at 248.324.2146 or sajarrett@fishbeck.com.

Sincerely,

Stephanie A. Jarrett

Stephanie A. Jarrett, PE
Vice President/Senior Environmental Engineer

By email and USPS
Copy: Max Disbrow – Owens Products (disbrowm@owensproducts.com)

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
ASC-001 APPLICATION SUBMITTAL AND CERTIFICATION

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

Source Name: Owens Products, Inc.	SRN: N5257	Section Number (if applicable):

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

Listing of ROP Application Contents. See the initial application instructions for guidance regarding which forms and attachments are required for your source. Check the box for the items included with your application.

☒	Completed ROP Initial Application Forms (required)	☐	Copies of all Consent Orders/Consent Judgments
☒	MAERS Forms (to report emissions not previously submitted)	☐	Compliance Plan/Schedule of Compliance
☒	HAP/Criteria Pollutant Potential to Emit Calculations	☐	Acid Rain Initial Permit Application
☐	Stack information	☐	Cross-State Air Pollution Rule (CSAPR) Information
☒	Copies of all active Permit(s) to Install (required)	☐	Additional Information (AI-001) Forms
☐	Compliance Assurance Monitoring (CAM) Plan	☒	Paper copy of all documentation provided (required)
☒	Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	☒	Electronic documents provided (optional)
☐	Confidential Information	☐	Other, explain:

Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in Permits to Install, this application and other applicable requirements that the source is subject to. ☒ Yes ☐ No

This source will continue to be in compliance with all of its applicable requirements, including those contained in Permits to Install, this application and other applicable requirements that the source is subject to. ☒ Yes ☐ No

This source will meet, in a timely manner, applicable requirements that become effective during the permit term. ☒ Yes ☐ No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing Permits to Install, this application and all other applicable requirements that the source is subject to.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

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

Max Disbrow, Plant Manager

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

Max H Disbrow — **Signature of Responsible Official**

8-31-2023 — **Date**

For Assistance
Contact: 800-662-9278

www.michigan.gov/egle

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
SI-001 SECTION INFORMATION

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

SRN: N5257	Section Number (if applicable):

SECTION INFORMATION	
Section Name	
Section Description (Including address if different from Source address identified on the S-001 Form)	
Emission Units Included In This Section	
EU-FLOWCHOP	**EU-**
EU-GELCOAT	**EU-**
EU-MISC	**EU-**
EU-TRIM	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**
EU-	**EU-**

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

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
S-001 STATIONARY SOURCE INFORMATION

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

SRN: N5257	Section Number (if applicable):

SOURCE INFORMATION

SIC Code	NAICS Code
3714	336399

Source Name
Owens Products, Inc.

Street Address
1107 Progress Street

City	State	ZIP Code	County
Sturgis	MI	49091	Saint Joseph

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

Source Description
Owens Productions, Inc. (Owens) is a manufacturer of Fiberglass Reinforced Plastic (FRP) for various automotive related accessories and components. Owens manufactures after-market running boards, aluminum tool and dog boxes, step bumpers, and fiberglass reinforced plastic components for the recreational vehicle (RV) industry.

OWNER INFORMATION

Owner Name
Owens Product, Inc.

Mailing address (☒ check if same as source address)

City	State	ZIP Code	County	Country

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

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION FORM
S-002 CONTACT AND RESPONSIBLE OFFICIAL INFORMATION

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

SRN: N5257	Section Number (if applicable):

At least one contact and one Responsible Official must be identified. Additional contacts and Responsible Officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name				Title
Max Disbrow				Plant Manager
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
269-865-2127		disbrowm@owensproducts.com		

Contact 2 Name (optional)				Title
Stephanie Jarrett				Senior Environmental Engineer
Company Name & Mailing address (☐ check if same as source address)				
Fishbeck – 39500 Mackenzie Dr #100				
City	State	ZIP Code	County	Country
Novi	MI	48377	Oakland	US
Phone number		E-mail address		
248-324-2146		sajarrett@fishbeck.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name				Title
Max Disbrow				Plant Manager
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
				US
Phone number		E-mail address		
269-865-2127		disbrowm@owensproducts.com		

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

☐ Check if an AI-001 Form is attached to provide more information for S-002. Enter AI-001 Form ID: **AI-**

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
S-003 SOURCE REQUIREMENT INFORMATION

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

SRN: N5257	Section Number (if applicable):

SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject. Refer to the ROP Initial Application Instructions for additional information.

1.	Actual emissions and associated data from **all** emission units with applicable requirements are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☐ Yes ☒ No
3.	a. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. b. Has an updated RMP been submitted to the USEPA?	☐ Yes ☒ No ☐ Yes ☒ No
4.	Does the source belong to one of the source categories that require quantification of fugitive emissions? If Yes, identify the category on an AI-001 Form and include the fugitive emissions in the PTE calculations for the source. *See ROP Initial Application instructions.*	☐ Yes ☒ No
5.	Does this stationary source have the potential to emit (PTE) of 100 tons per year or more of any criteria pollutant (PM-10, PM 2.5, VOC, NOx, SO_2, CO, lead)? If Yes, include potential emission calculations for each identified pollutant on an AI-001 Form.	☐ Yes ☒ No
6.	Does this stationary source emit any hazardous air pollutants (HAPs) regulated by the federal Clean Air Act, Section 112? If Yes, include potential and actual emission calculations for HAPs, **including fugitive emissions** on an AI-001 Form.	☒ Yes ☐ No
7.	a. Are any emission units subject to Compliance Assurance Monitoring (CAM)? If Yes, identify the specific emission unit(s) and pollutant(s) subject to CAM on an AI-001 Form. b. Is a CAM plan included with this application on an AI-001 Form?	☐ Yes ☒ No ☐ Yes ☒ No
8.	Does the source have any active Consent Orders/Consent Judgments (CO/CJ)? If Yes, attach a copy of each CO/CJ on an AI-001 Form.	☐ Yes ☒ No
9.	Are any emission units subject to the federal Cross State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
10.	a. Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the Federal Acid Rain Program on an AI-001 Form. b. Is an Acid Rain Permit Application included with this application?	☐ Yes ☒ No ☐ Yes ☒ No
11.	Does the source have any required plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, startup/shutdown plans or any other monitoring plan? If Yes, then the plan(s) must be submitted with this application on an AI-001 Form.	☒ Yes ☐ No
12.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then the requirement and justification must be submitted on an AI-001 Form.	☐ Yes ☒ No

☒ Check if an AI-001 Form is attached to provide more information for S-003. Enter AI-001 Form ID: **AI-ROP, AI-PTE, AI-Plans**

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
EU-001 PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNITS

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

SRN: N5257	Section Number (if applicable):

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

1. Does the source have any emission units that are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules, not including Rules 281(2)(h), 287(2)(c), and 290?

☒ Yes ☐ No

If Yes, identify the emission units in the table below. If No, go to the EU-002 Form.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either an EU-002 or EU-004 Form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**PTI Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]
EU-FURNACES	Three 100,000 Btu/hr furnaces located in the West Office, East Office, and Attic.	282(2)(b)(i)	212(4)(c)
EU-HEATERS	Eight ceiling mounted radiant heaters: Five 160,000; one 175,000; one 125,000; and one 150,000 BTU/hr	282(2)(b)(i)	212(4)(c)
EU-AcetoneReclaim	Small Distillation Unit for reclaiming acetone (about 5 gal).	285(2)(u)	212(4)(e)
EU-			
EU-			
EU-			
EU-			
EU-			
EU-			

Comments:

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

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
EU-002 EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

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

SRN: N5257	Section Number (if applicable):

Review all emission units and applicable requirements at the source and provide the following information.

1. Does the source have any emission units which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290. ☐ Yes ☒ No

   If Yes, identify the emission units in the table below. If No, go to the EU-003 Form.

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

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

Comments:

☐ Check if an AI-001 Form is attached to provide more information for EU-002. Enter AI-001 Form ID: **AI-**

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
EU-003 EMISSION UNITS WITH PERMITS TO INSTALL

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

SRN: N5257	Section Number (if applicable):

Review all emission units at the source and fill in the information in the following table for **all** emission units with Permits to Install (PTI). Any PTI(s) identified below must be attached to the application.

Permit to Install Number	Emission Unit ID	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed
399-93D	**EU-**FLOWCHOP	Resin lamination process with associated mechanical non-atomized flow/chop applicator gun for resin & fiberglass application used in a flow/chop spray booth. Spray booth is equipped with a dry filter overspray control system. Mechanical atomized applicator gun will also be allowed for use in applying tooling resin(s) and ceramic resin(s). Manual application may also be used for high-strength resins.	2003
399-93D	**EU-**GELCOAT	Gelcoat application process with associated mechanical non-atomized applicator gun used in a gelcoat spray booth. The spray booth is equipped with a dry filter overspray control system. Mechanical atomized applicator gun will also be allowed for use in applying tooling gelcoat(s).	1993
399-93D	**EU-**MISC	Miscellaneous activities inside and outside booths which include mold releases, mold cleaners, repair fillers, and cleanup/purging activities using acetone.	1993
399-93D	**EU-**TRIM	Cutting/sanding of molded materials in the trim area with dust control provided by a dust collector which is equipped with fabric filter collector bags and a differential pressure gauge. Control system may be exhausted indoors or outdoors.	1993
	EU-		
	EU-		
	EU-		
	EU-		
	EU-		

1. Are you proposing changes to any emission unit names, descriptions or control devices in the PTIs listed above? If Yes, describe the proposed changes on an AI-001 Form. ☐ Yes ☒ No

2. Are you proposing additions or clarifications to any permit conditions? If Yes, describe the proposed changes on an AI-001 Form. ☐ Yes ☒ No

3. Are you proposing monitoring, testing, recordkeeping and/or reporting necessary to demonstrate compliance with any applicable requirements? If Yes, describe the proposed conditions on an AI-001 Form. ☐ Yes ☒ No

☒ Check if an AI-001 Form is attached to provide more information for EU-003. Enter AI-001 Form ID: **AI-**PTI

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
EU-004 OTHER EMISSION UNITS

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

SRN: N5257	Section Number (if applicable):

Complete an EU-004 Form for **all** emission units with applicable requirements that have **not** been addressed on an EU-001, EU-002 or EU-003 Form. This would include grandfathered emission units or PTI exempt emission units subject to applicable requirements in the AQD Rules, and emission units subject to a MACT, NESHAP, NSPS, or other federal requirement.

1. Does the source have emission units with applicable requirements that have not been addressed on the EU-001, EU-002 and/or EU-003 Forms? ☐ Yes ☒ No

   If Yes, provide the required information below. Complete the AR-001 and/or AR-002 Form(s) to identify all applicable requirements and all monitoring, testing, recordkeeping and/or reporting to demonstrate compliance with the applicable requirements.

Emission Unit ID **EU-**	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – *If different from S-001 Form*
Emission Unit Description – *Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms)*.			

Emission Unit ID **EU-**	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – *If different from S-001 Form*
Emission Unit Description – *Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms)*.			

Emission Unit ID **EU-**	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – *If different from S-001 Form*
Emission Unit Description – *Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms)*.			

☐ Check if an AI-001 Form is attached to provide more information for EU-004. Enter AI-001 Form ID: **AI-**

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
FG-001: FLEXIBLE GROUPS

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

SRN: N5257	Section Number (if applicable):

Complete the FG-001 Form for all Emission Units (EUs) that you want to combine into a Flexible Group (FG). Create a descriptive ID for the FG and description, and list the IDs for the EUs to be included in the FG. See instructions for FG examples.

Flexible Group ID **FG-**MACTWWWW			
Flexible Group Description Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785 and also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.			
Emission Unit IDs			
EU-FLOWCHOP	**EU-**GELCOAT	**EU-**MISC	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**

Flexible Group ID **FG-**			
Flexible Group Description			
Emission Unit IDs			
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**
EU-	**EU-**	**EU-**	**EU-**

☒ Check if an AI-001 Form is attached to provide more information for FG-001. Enter AI-001 Form ID: **AI-**PTI

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
AR-001 APPLICABLE REQUIREMENTS FROM MACT, NESHAP OR NSPS

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

SRN: N5257	Proposed Section Number (if applicable):

Answer the question below for emission units subject to a MACT, NESHAP or NSPS regulation and provide either an existing Permit to Install, an existing template table*, or a newly created table** that contains the applicable requirements for each subject emission unit with the application, including associated monitoring, testing, recordkeeping and reporting necessary to demonstrate compliance.

1. Is any emission unit subject to a Maximum Achievable Control Technology (MACT) standard in 40 CFR Part 63, National Emission Standard for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61, or New Source Performance Standard (NSPS) in 40 CFR Part 60? ☒ Yes ☐ No

   If yes, identify the emission units and applicable MACT, NESHAP or NSPS in the table below.

Note: If several emission units are subject to the same regulation, list all of the emission unit IDs together. Attach the applicable requirements (PTI, template table or newly created table) in the selected format to the application using an AI-001 Form.

MACT NESHAP or NSPS Subpart and Name	**Emission Unit ID –** *Provide the Emission Unit ID you created on the EU-003 or EU-004 Form*	**Applicable Requirements Attached in Which Format?**
NESHAP WWWW	EUFLOWCHOP	☒ PTI No. 399-93D ☐ Template Table* ☐ Newly Created Table**
NESHAP WWWW	EUGELCOAT	☒ PTI No. 399-93D ☐ Template Table* ☐ Newly Created Table**
NESHAP WWWW	EUMISC	☒ PTI No. 399-93D ☐ Template Table* ☐ Newly Created Table**
		☐ PTI No. ☐ Template Table* ☐ Newly Created Table**
		☐ PTI No. ☐ Template Table* ☐ Newly Created Table**

STREAMLINED REQUIREMENTS

2. Are you proposing to streamline any requirements? ☐ Yes ☒ No

   If yes, identify the streamlined and subsumed requirements and provide the EU ID and a justification for streamlining the applicable requirement on an AI-001 Form.

*MACT and NSPS template tables (available at the link below)

**Blank EU or FG template tables (available at the link below)

http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits(ROP)/Title V", then "ROP Forms & Templates")

☒ Check if an AI-001 Form is attached to provide more information for AR-001. Enter AI-001 Form ID: **AI-**PTI

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
AR-002 OTHER APPLICABLE REQUIREMENTS

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

SRN: N5257	Section Number (if applicable):

APPLICABLE REQUIREMENTS NOT INCLUDED IN A PTI, MACT, NESHAPS, NSPS, OR PERMIT EXEMPTION

Answer the questions below and create an EU table to identify terms and conditions for each emission unit identified on an EU-004 Form (other than MACT, NESHAP, or NSPS requirements). This would include emission units that are grandfathered or exempt from PTI requirements but subject to state rules, federal rules or consent orders/consent judgments. Blank EU template tables are available on the EGLE Internet at: http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates")

1. Is there an emission unit identified on an EU-004 Form that is subject to **emission limit(s**)? If Yes, fill out an EU table to identify the emission limit(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
2. Is there an emission unit identified on an EU-004 Form that is subject to **material limit(s)**? If Yes, fill out an EU table to identify the material limit(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
3. Is there an emission unit identified on an EU-004 Form that is subject to **process/operational restriction(s)**? If Yes, fill out an EU table to identify the process/operational restriction(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
4. Is there an emission unit identified on an EU-004 Form that is subject to **design/equipment parameter(s)**? If Yes, fill out an EU table to identify the design/equipment parameter(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	

5. Is there an emission unit identified on an EU-004 Form that is subject to **testing/sampling requirement(s)**? If Yes, fill out an EU table to identify the testing/sampling requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
6. Is there an emission unit identified on an EU-004 Form that is subject to **monitoring/recordkeeping requirement(s)**? If Yes, fill out an EU table to identify the monitoring/recordkeeping requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
7. Is there an emission unit identified on an EU-004 Form that is subject to **reporting requirement(s)**? If Yes, fill out an EU table to identify reporting requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
8. Is there an emission unit identified on an EU-004 Form that is subject to **stack/vent restriction(s)**? If Yes, fill out an EU table to identify stack/vent restriction(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
9. Are there any other requirements that you would like to **add** for an emission unit identified on an EU-004 Form? If Yes, fill out an EU table to identify the requirements, and provide the EU ID and a justification for the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
10. Are you proposing to streamline any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below. Do not include requirements identified on an AR-001 Form.	☐ Yes ☒ No
All applicable emission units included in PTI.	
☒ Check if an AI-001 Form is attached to provide more information for AR-002. Enter AI-001 Form ID: **AI-**PTI	

EGLE

RENEWABLE OPERATING PERMIT INITIAL APPLICATION
AR-003 SOURCE-WIDE APPLICABLE REQUIREMENTS

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

SRN: N5257	Section Number (if applicable):

Complete a Source-wide table for any conditions that apply to the entire source. A blank Source-wide template table is available on the EGLE Internet at:
http://michigan.gov/air (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates")

1. Are there any applicable requirements that apply to the entire source? If Yes, identify the conditions by utilizing a Source-wide template table and include all of the appropriate applicable requirements, including associated monitoring, testing, recordkeeping and reporting necessary to demonstrate compliance. Provide information regarding the applicable requirements in the comment field below.	☐ Yes ☒ No
Comments	

☐ Check if an AI-001 Form is attached to provide more information for AR-003. Enter AI-001 Form ID: **AI-**

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: N5257	Section Number (if applicable):

1. Additional Information ID
AI-ROP

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Summary of Initial ROP

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: N5257	Section Number (if applicable):

1. Additional Information ID
AI-PTE

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached are the potential to emit (PTE) calculations for the facility.

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: N5257	Section Number (if applicable):

1. Additional Information ID
AI-Plan

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached is the Nuisance Minimization Plan referenced in PTI 399-93D

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: N5257	Section Number (if applicable):

1. Additional Information ID
AI-Plan

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached is the Nuisance Minimization Plan referenced in PTI 399-93D

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: N5257	Section Number (if applicable):

1. Additional Information ID
AI-PTI

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached is PTI 399-93D. We are not requesting any changes. AI-PTI is referenced on the following forms:

EU-003: please see attached PTI 399-93D.
FG-001: FG-MACTWWWW established pursuant to PTI 399-93D.
AR-001: FG-MACTWWWW established pursuant to PTI 399-93D.
AR-002: All applicable emission units included in PTI.

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

September 14, 2022

PERMIT TO INSTALL
399-93D

ISSUED TO
Owens Products, Inc.

LOCATED AT
1107 Progress Street
Sturgis, Michigan 49091

IN THE COUNTY OF
Saint Joseph

STATE REGISTRATION NUMBER
N5257

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **May 23, 2022**	
DATE PERMIT TO INSTALL APPROVED: **September 14, 2022**	SIGNATURE: MaryAnn Dolehanty
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS

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

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H_2S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO_x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO_2	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

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

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
    a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
    b) A visible emission limit specified by an applicable federal new source performance standard.
    c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUFLOWCHOP	Resin lamination process with associated mechanical non-atomized flow/chop applicator gun for resin and fiberglass application used in a flow/chop spray booth. The spray booth is equipped with a dry filter overspray control system. Mechanical atomized applicator gun will also be allowed for use in applying tooling resin(s) and ceramic resin(s). Manual application may also be used for high-strength resins.	2003 / TBD	FGMACTWWWW
EUGELCOAT	Gelcoat application process with associated mechanical non-atomized applicator gun used in a gelcoat spray booth. The spray booth is equipped with a dry filter overspray control system. Mechanical atomized applicator gun will also be allowed for use in applying tooling gelcoat(s).	1993 / TBD	FGMACTWWWW
EUMISC	Miscellaneous activities inside and outside booths which include mold releases, mold cleaners, repair fillers, and cleanup/purging activities using acetone.	1993 / TBD	FGMACTWWWW
EUTRIM	Cutting/sanding of molded materials in the trim area with dust control provided by a dust collector which is equipped with fabric filter collector bags and a differential pressure gauge. Control system may be exhausted indoors or outdoors.	1993 / TBD	NA

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

EUFLOWCHOP
EMISSION UNIT CONDITIONS

DESCRIPTION

Resin lamination process with associated mechanical non-atomized flow/chop applicator gun for resin and fiberglass application used in a flow/chop spray booth. The spray booth is equipped with a dry filter overspray control system. Mechanical atomized applicator gun will also be allowed for use in applying tooling resin(s) and ceramic resin(s). Manual application may also be used for high-strength resins.

Flexible Group ID: FGMACTWWWW

POLLUTION CONTROL EQUIPMENT

Dry filter overspray control system

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	15.7 tpy	12-month rolling time period as determined at the end of each calendar month	EUFLOWCHOP	SC VI.1, VI.2, VI.3	**R 336.1702(a)**

II. MATERIAL LIMIT(S)

1. The permittee shall not exceed the monomer content limits listed in the following table for EUFLOWCHOP: **(R 336.1225, R 336.1702(a))**

Material	Limit
a) Lamination Resin	37% styrene and vinyl toluene (combined) by weight
b) Lamination Resin	10% vinyl toluene, by weight[1]
c) Ceramic Resin	37% styrene by weight
d) Tooling Resin	40% styrene by weight

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUFLOWCHOP and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**

2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**

3. The permittee shall handle all VOC and/or HAPs containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**

4. No later than 45 days after permit issuance, the permittee shall submit, implement, and maintain a nuisance minimization plan (NMP) for odors. The NMP shall include at a minimum, but not be limited to:
   a) Procedures for maintaining and operating EUFLOWCHOP in a manner that minimizes the release of odors to the outside air.
   b) Procedures that shall be taken to address odor complaints.
   c) A plan for corrective action to address any odor releases to the outside air.

   If at any time the plan fails to address or inadequately addresses odor management, the permittee shall amend the plan within 30 days after such an event occurs. The permittee shall also amend the plan within 30 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 60 days of submittal, the plan or amended plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to minimize odors. **(R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any booth associated with EUFLOWCHOP unless its respective exhaust filter is installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1331)**

2. The permittee shall equip and maintain EUFLOWCHOP with the applicators listed in the following table or technology with equivalent or lower styrene emission rates: **(R 336.1225, R 336.1702(a))**

Material	Applicator Method
a) Lamination Resins	Manual and Mechanical Non-Atomized Applicators
b) Tooling Resins	Mechanical Atomized Applicator
c) Ceramic Resins	Mechanical Atomized Applicator
d) High-Strength Resins	Manual and Mechanical Non-Atomized Applicators

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1225, R 336.1702)**

2. The permittee shall keep a separate record of the styrene monomer content for each shipment of resin received. For lamination resins with vinyl toluene, the permittee shall also keep a separate record of the vinyl toluene content of the resin, and the total monomer content (styrene and vinyl toluene combined) of the resin. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information for each calendar month for EUFLOWCHOP:
   a) The identity and amount (in pounds) of each material used.
   b) The styrene content (in percent by weight) of each resin used, plus any extra styrene added by the permittee, but before the addition of other additives such as powders, fillers, glass, catalyst, etc.
   c) The vinyl toluene content (in percent be weight) of each resin used.
   d) The VOC content (in percent by weight), including styrene and vinyl toluene, of each material used.

e) The appropriate emission factors for each raw material used:
   i. The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009, shall be used only for styrene and MMA emission calculations for open molding processes,
   ii. An emission factor of 7% by weight of vinyl toluene monomer,
   iii. Mass balance used for non-styrene, non-vinyl toluene, VOC emissions, or
   iv. Alternate emission factors may be used with the approval of the AQD District Supervisor.

f) VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using the UEF table, vinyl toluene emission factor, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request. **(R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVFLOWCHOP	24	38	**R 336.1225, R 336.1901, 40 CFR 52.21l & (d)**

IX. OTHER REQUIREMENT(S)

NA

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

EUGELCOAT
EMISSION UNIT CONDITIONS

DESCRIPTION

Gelcoat application process with associated mechanical non-atomized applicator gun used in a gelcoat spray booth. The spray booth is equipped with a dry filter overspray control system. Mechanical atomized applicator gun will also be allowed for use in applying tooling gelcoat(s).

Flexible Group ID: FGMACTWWWW

POLLUTION CONTROL EQUIPMENT

Dry filter overspray control system

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	29.1 tpy	12-month rolling time period as determined at the end of each calendar month	EUGELCOAT	SC VI.1, VI.2, VI.3	**R 336.1702(a)**

II. MATERIAL LIMIT(S)

Material	Maximum Styrene Content (wt %)	Maximum Methyl methacrylate (MMA) Content (wt %)	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
a) Black gelcoats	36.0	6.0	NA	EUGELCOAT	SC VI.1, VI.2, VI.3	**R 336.1702(a)**
b) Tooling gelcoats	42.0	6.0	NA	EUGELCOAT	SC VI.1, VI.2, VI.3	**R 336.1702(a)**
c) All Other gelcoats	35.0	6.0	NA	EUGELCOAT	SC VI.1, VI.2, VI.3	**R 336.1702(a)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUGELCOAT and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**

2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**

3. The permittee shall handle all VOC and/or HAPs containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**

4. No later than 45 days after permit issuance, the permittee shall submit, implement, and maintain a nuisance minimization plan (NMP) for odors. The NMP shall include at a minimum, but not be limited to:
   a) Procedures for maintaining and operating EUGELCOAT in a manner that minimizes the release of odors to the outside air.
   b) Procedures that shall be taken to address odor complaints.
   c) A plan for corrective action to address any odor releases to the outside air.

   If at any time the plan fails to address or inadequately addresses odor management, the permittee shall amend the plan within 30 days after such an event occurs. The permittee shall also amend the plan within 30 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 60 days of submittal, the plan or amended plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to minimize odors. **(R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any booth associated with EUGELCOAT unless its respective exhaust filter is installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1331)**

2. The permittee shall equip and maintain EUGELCOAT with the applicators listed in the following table or technology with equivalent or lower styrene emission rates: **(R 336.1225, R 336.1702(a))**

Material	Applicator Method
a) Tooling Gelcoats	Mechanical Atomized Applicator
b) All Other Gelcoats	Mechanical Non-Atomized Applicator

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1225, R 336.1702)**

2. The permittee shall keep a separate record of the styrene and MMA monomer contents for each shipment of gelcoat received. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information for each calendar month for EUGELCOAT:

   a) The identity and amount (in pounds) of each material used.
   b) The styrene content (in percent by weight) of each gelcoat used determined as supplied, plus any extra styrene added by the permittee, but before the addition of other additives such as powders, fillers, glass, catalysts, etc.
   c) The MMA content (in percent by weight) of each gelcoat used.
   d) The VOC (including styrene and MMA) content of each material used.

e) The appropriate emission factors for each raw material used:
   i. The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009, shall be used only for styrene and MMA emission calculations for open molding processes,
   ii. Mass balance used for non-styrene, non-MMA VOC emissions, or
   iii. Alternate emission factors may be used with the approval of the AQD District Supervisor.

f) VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using the UEF table, mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file make them available to the Department upon request. **(R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVGELCOAT	24	40	**R 336.1225, R 336.1901, 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).

EUMISC
EMISSION UNIT CONDITIONS

DESCRIPTION

Miscellaneous activities inside and outside booths which include mold releases, mold cleaners, repair fillers, and cleanup/purging activities using acetone.

Flexible Group ID: FGMACTWWWW

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	0.8 tpy	12-month rolling time period as determined at the end of each calendar month	EUMISC	SC VI.1, VI.2	**R 336.1225, R 336.1702(a)**
2. Acetone	20.0 tpy[1]	12-month rolling time period as determined at the end of each calendar month	EUMISC	SC VI.1, VI.2	**R 336.1224, R 336.1225**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials used in EUMISC and store them in closed containers. The permittee shall dispose of waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**

2. The permittee shall handle all VOC and/or HAPs containing materials in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1224, R 336.1225, R 336.1702(a))**

3. No later than 45 days after permit issuance, the permittee shall submit, implement, and maintain a nuisance minimization plan (NMP) for odors. The NMP shall include at a minimum, but not be limited to:
   a) Procedures for maintaining and operating EUMISC in a manner that minimizes the release of odors to the outside air.
   b) Procedures that shall be taken to address odor complaints.
   c) A plan for corrective action to address any odor releases to the outside air.

   If at any time the plan fails to address or inadequately addresses odor management, the permittee shall amend the plan within 30 days after such an event occurs. The permittee shall also amend the plan within 30 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 60 days of submittal, the plan or amended plan shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to minimize odors. **(R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1224, R 336.1225, R 336.1702(a))**

2. The permittee shall keep the following information on a monthly basis for EUMISC:
   a) The identity of each material and clean-up solvent used.
   b) The amount (in gallons or pounds) of each material and clean-up solvent used.
   c) Where applicable, gallons or pounds of each clean-up solvent reclaimed.
   d) The VOC content of each material and clean-up solvent used.
   e) The acetone content of each material and clean-up solvent used.
   d) Acetone emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
   e) VOC emission calculation determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records using mass balance or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

EUTRIM
EMISSION UNIT CONDITIONS

DESCRIPTION

Cutting/sanding of molded materials in the trim area with dust control provided by a dust collector which is equipped with fabric filter collector bags and a differential pressure gauge. Control system may be exhausted indoors or outdoors.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Fabric filter collector with differential pressure gauge

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUTRIM unless the fabric filter control system is installed, maintained, and operated in a satisfactory manner. **(R 336.1301, R 336.1331, R 336.1901)**

2. The permittee shall not operate EUTRIM unless a gauge, which measures the pressure drop across the fabric filter collector is installed, maintained and operated in a satisfactory manner. **(R 336.1301, R 336.1331, R 336.1901, R 336.1910)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACTWWWW	Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785. Reinforced plastic composites production also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.	EUFLOWCHOP, EUGELCOAT, EUMISC

FGMACTWWWW
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production is defined in 40 CFR 63.5785. Reinforced plastic composites production also includes associated activities, such as cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

Emission Units: EUFLOWCHOP, EUGELCOAT, EUMISC

POLLUTION CONTROL EQUIPMENT

Dry fabric filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP from Open Molding – Corrosion Resistant and/or High Strength (CR/HS) Resin, Mechanical Application	113 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
2. Organic HAP from Open Molding – Non CR/HS Resin, Mechanical Application	88 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
3. Organic HAP from Open Molding – Tooling Resin, Mechanical Application	254 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
4. Organic HAP from Open Molding – Low-flame spread/low-smoke products	497 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
5. Organic HAP from Open Molding – Shrinkage controlled resins	354 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
6. Organic HAP from Open Molding – Tooling gel coat	440 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
7. Organic HAP from Open Molding – White/off white pigmented gel coat	267 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
8. Organic HAP from Open Molding – All other pigmented gel coat	377 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
9. Organic HAP from Open Molding – CR/HS or high performance gel coat	605 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
10. Organic HAP from Open Molding – Fire retardant gel coat	854 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**
11. Organic HAP from Open Molding – Clear production gel coat	522 lb/ton	12-month rolling average as determined at the end of each calendar month	FGMACTWWWW	SC V.1	**40 CFR 63.5835(a)**

12. The permittee shall use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of Subpart WWWW of Part 63. **(40 CFR 63.5810)**
    a) Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 of Subpart WWWW of Part 63. **(40 CFR 63.5810(a))**
    b) Demonstrate that, on average, the facility meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to the facility. **(40 CFR 63.5810(b))**
    c) Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the permittee meets each weighted average of the organic HAP emissions limits in Table 3 to this subpart that apply to the weighted average organic HAP emissions limit for all open molding operations. **(40 CFR 63.5810(c))**
    d) Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. **(40 CFR 63.5810(d))**

13. The permittee may switch between the compliance options in SC I.12.a through 12.d. When changing to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option the facility is changing to, unless the facility previously used an option that did not require the facility to maintain records of resin or gel coat. In this case, the facility must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. **(40 CFR 63.5805, Table 4)**

2. For each HAP-containing materials storage operation, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. **(40 CFR 63.5805, Table 4)**

3. For each mixing operation, the permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. **(40 CFR 63.5805, Table 4)**

4. For each mixing operation, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement. **(40 CFR 63.5805, Table 4)**

5. For each mixing operation, the permittee shall keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR 63.5805, Table 4)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336. 1201(3))**

1. The permittee shall determine the HAP content of any resin(s) as received and as applied, using manufacturer's formulation data and safety data sheets, using the procedures outlined in 40 CFR 63.5797 (a) through (c) as applicable. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(40 CFR 63.5797)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336. 1201(3))**

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.5840 and 40 CFR 63.5860. **(40 CFR 63.5840, 40 CFR 63.5860)**

2. The permittee shall demonstrate continuous compliance with the applicable standards according to the procedures outlined in 40 CFR 63.5895 and 40 CFR 63.5900. **(40 CFR 63.5895, 40 CFR 63.5900)**

3. The permittee shall keep all records required by 40 CFR 63.5915 in the format and timeframes outlined in 40 CFR 63.5920. The records must be kept onsite for a period of at least two years. The records must be kept for a total of at least five years. **(40 CFR 63.5915, 40 CFR 63.5920)**

4. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date:[2]
   a) A copy of each notification and report that is submitted to comply with 40 CFR Part 63 Subpart WWWW, and the documentation supporting each notification as specified in 40 CFR 63.5915(a)(1). **(40 CFR 63.5915(a))**
   b) Records of all data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for operations listed in Table 3 to 40 CFR Part 63 Subpart WWWW. **(40 CFR 63.5915(c))**
   c) A certified statement demonstrating compliance with all applicable work practice standards identified in Table 4 of 40 CFR Part 63 Subpart WWWW. **(40 CFR 63.5915(d))**

5. The permittee shall keep records documenting that the resin(s) used in FGMACTWWWW meet(s) the requirements for corrosion-resistant resin, non-corrosion-resistant resin, or tooling resin as outlined in 40 CFR 63.5935. **(40 CFR 63.5935)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336. 1201(3))**

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. 1201(3))**

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. 1201(3))**

4. The permittee shall submit the applicable notifications specified in, and according to the timeframes in 40 CFR 63.5905. **(40 CFR 63.5905)**

5. The permittee shall submit all applicable reports identified in, and according to the timeframes in 40 CFR 63.5910. **(40 CFR 63.5910)**

6. The permittee shall submit semiannual reporting of compliance as required in 40 CFR 63.5910(c). The report shall include the following:
   a) Company name and address. **(40 CFR 63.5910(c)(1))**
   b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.5910(c)(2))**
   c) Date of the report and beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(3))**
   d) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. **(40 CFR 63.5910(c)(5))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production by the initial compliance date. **(40 CFR Part 63, Subparts A and WWWW)**

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

AI-ROP – Summary of Emission Units Included PTI
ROP Initial Application
Owens Products, Inc.; Sturgis, MI

Emission Unit ID	Emission Unit Description	Installation Date/ Modification Date	Flexible Group ID	H.3 Remove/Add (yes/no)	New PTI not previously incorporated in to ROP	H.2 Administrative Changes to EU names, description, or CE	C.1 Emissions Reported to MAERS	Applicable Stacks	E.2 Stacks Reported to MAERS	C.7 Plans required to be Submitted	Notes
EUFLOWCHOP (EU0001)	Resin lamination process with associated mechanical non-atomized flow/chop applicator gun for resin and fiberglass application used in a flow/chop spray booth. The spray booth is equipped with a dry filter overspray control system. Mechanical atomized applicator gun will also be allowed for use in applying tooling resin(s) and ceramic resin(s). Manual application may also be used for high-strength resins.	2003/TBD	FGMACTWWWW	No	399-93D	NA	Yes	SVFLOWCHOP (SV0005)	SVFLOWCHOP (SV0005)	Yes	Nuisance minimization plan (NMP)
EUGELCOAT (EU0002)	Gelcoat application process with associated mechanical non-atomized applicator gun used in a gelcoat spray booth. The spray booth is equipped with a dry filter overspray control system. Mechanical atomized applicator gun will also be allowed for use in applying tooling gelcoat(s).	1993/TBD	FGMACTWWWW	No	399-93D	NA	Yes	SVGELCOAT (SV0006)	SVGELCOAT (SV0006)	Yes	Nuisance minimization plan (NMP)
EUMISC (EU0004)	Miscellaneous activities inside and outside booths which include mold releases, mold cleaners, repair fillers, and cleanup/purging activities using acetone.	1993/TBD	FGMACTWWWW	No	399-93D	NA	Yes - Also referred to as EUCLEANUP	No	NA	Yes	Nuisance minimization plan (NMP)
EUTRIM (EU0003)	Cutting/sanding of molded materials in the trim area with dust control provided by a dust collector which is equipped with fabric filter collector bags and a differential pressure gauge. Control system may be exhausted indoors or outdoors.	1993/TBD	NA	No	399-93D	NA	Yes	No	NA	No	NA

AI-ROP – Summary of Exempt Emission Units
ROP Initial Application
Owens Products, Inc.; Sturgis, MI

Emission Unit	Description	Exemption	Rule	Required to be listed	Application Part	Reported to MAERS	Applicable Requirements	NOTES
EUFURNACES	Three 100,000 Btu/hr furnaces located in the West Office, East Office, and Attic.	282(2)(b)(i)	212(4)(c)	Yes	EU-001	Not required	No	Comfort heating - not subject to NESHAP DDDD
EUHEATERS	Eight ceiling mounted radiant heaters: Five 160,000; one 175,000; one 125,000; and one 150,000 BTU/hr	282(2)(b)(i)	212(4)(c)	Yes	EU-001	Not required	No	Comfort heating - not subject to NESHAP DDDD

AI-ROP – List of Stacks
ROP Initial Application
Owens Products, Inc.; Sturgis, MI

Emission Unit/Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	5. Remove from MAERS	6. Dismantle Date (MM/DD/YYYY)	7. Stack Description	8. Height Above Ground (feet)	verified height	Permitted Height Above Ground (feet)
EUFLOWCHOP	SVFLOWCHOP	EU0001; SV0005	N	NA	Chop booth vent	40	40	Min.38
EUGELCOAT	SVGELCOAT	EU0002; SV0006	N	NA	Gelcoat booth stack	40	40	Min. 40

Emission Unit/Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	9. Inside Stack Diameter (inches)	verified diameter	Permitted Stack Diameter (inches)	10. Exit Gas Temperature (°F)	verified discharge temp	11. Actual Exit Gas Flow Rate (CFM)
EUFLOWCHOP	SVFLOWCHOP	EU0001; SV0005	24	24	24	80	80	24,000
EUGELCOAT	SVGELCOAT	EU0002; SV0006	24	24	24	80	80	24,000

Emission Unit/Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	12. Stack Orientation	verified orientation	verified rain protection	13. Latitude	14. Longitude	15. Horizontal Collection Method
EUFLOWCHOP	SVFLOWCHOP	EU0001; SV0005	Vertical	Vertical		41.8047	-85.4301	001 The geographic coordinate determination method based on address matching-house number
EUGELCOAT	SVGELCOAT	EU0002; SV0006	Vertical	Vertical		41.8047	-85.4301	001 The geographic coordinate determination method based on address matching-house number.

Emission Unit/Flexible Group	Stacks Reported to MAERS	4. Stack & Vent ID	16. Source Map Scale Number (only required if 15 = 018)	17. Horizontal Accuracy Measure (Meters)	18. Horizontal Reference Datum Code	19. Reference Point Code	20. Bypass Stack Only (yes/no)	21. If yes, operator ID of main stack
EUFLOWCHOP	SVFLOWCHOP	EU0001; SV0005		1	003 World Geodetic System of 1984	106 Point where a substance is released.	No	
EUGELCOAT	SVGELCOAT	EU0002; SV0006		1	003 World Geodetic System of 1984	106 Point where a substance is released.	No	

AI-ROP – Exempt process or process equipment that need to be listed in an administratively complete application for a renewable operating permit
ROP Initial Application
Owens Products, Inc.; Sturgis, MI

R336.1212(4) Unless subject to a process-specific emission limitation or standard, all of the following process or process equipment need only be listed in an administratively complete application for a renewable operating permit. The list shall include a description of the process or process equipment, including any control equipment pertaining to the process or process equipment, the source classification code (SCC), and a reference to the subdivision of this subrule that identifies the process or process equipment:

Company Name Owens Products, Inc.
Date 8/28/2023

Rule	Process/Process Equipment	Exemption Rule #	Specific Exemption	Is process or equipment located at facility?	Notes
Emission Units meeting the criteria of 281(h), 285(r)(iv), 287(c) or 290. LIST ON EU-002 FORM OF INITIAL APPLICATION LIST IN PART G OF RENEWAL APPLICATION					
R336.1212(4)(b)	Cleaning, washing, and drying equipment	R336.1281(2)(h)	Cold cleaners that have an air/vapor interface of not more than 10 square feet.	No	
R336.1212(4)(e)	Miscellaneous	R336.1281(2)(r)(iv)	Equipment used for any of the following metal treatment processes if the process emissions are only released into the general in-plant environment: (iv) Cleaning.	No	
R336.1212(4)(f)	Surface coating equipment	R336.1287(2)(c)	(c) A surface coating line if all of the following conditions are met: (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month. (ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.	No	
R336.1212(4)(h)	Process or process equipment which has limited emissions	R336.1290	An emission unit which meets any of the following criteria : (i) Any emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials that are listed in R 336.1122(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. (ii) Any emission unit for which the CO2 equivalent emissions are not more than 6,250 tons per months, the uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all of the following criteria are met :(See Rule for A-D requirements) (iii) Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under paragraph (i) or (ii) of this subdivision if all of the following provisions are met:(See Rule for A-C requirements) (See Rule for complete Rule 290 description)	No	

AI-ROP – Exempt process or process equipment that need to be listed in an administratively complete application for a renewable operating permit
ROP Initial Application
Owens Products, Inc.; Sturgis, MI

R336.1212(4) Unless subject to a process-specific emission limitation or standard, all of the following process or process equipment need only be listed in an administratively complete application for a renewable operating permit. The list shall include a description of the process or process equipment, including any control equipment pertaining to the process or process equipment, the source classification code (SCC), and a reference to the subdivision of this subrule that identifies the process or process equipment:

Company Name Owens Products, Inc.
Date 8/28/2023

Rule	Process/Process Equipment	Exemption Rule #	Specific Exemption	Is process or equipment located at facility?	Notes
The following equipment need only be listed in an Administratively Complete Application unless subject to a process-specific emission limitation or standard LIST ON EU-001 FORM OF INITIAL APPLICATION LIST IN PART D OF RENEWAL APPLICATION					
R336.1212(4)(a)	Cooling and ventilation equipment	R336.1280(2)(a)	Cold storage refrigeration equipment and storage of the refrigerant, including cold storage equipment using anhydrous ammonia that has storage capacity of less than 500 gallons.	No	
R336.1212(4)(b)	Cleaning, washing, and drying equipment	R336.1281(2)(g)	Dry-cleaning equipment that has a capacity of 100 or less pounds of clothes.	No	
R336.1212(4)(c)	Fuel-burning furnaces, ovens, and heaters	*R336.1282(2)(a)*	*Any of the following processes or process equipment which are electrically heated or which fire sweet gas fuel or no. 1 or no. 2 fuel oil at a maximum total heat input rate of not more than 10,000,000 Btu per hour:*	No	
		R336.1282(2)(a)(i)	Furnaces for heat treating or forging glass or metals, the use of that does not involve ammonia, molten materials, oil-coated parts, or oil quenching.	No	
		R336.1282(2)(a)(ii)	Porcelain enameling furnaces or porcelain enameling drying ovens.	No	
		R336.1282(2)(a)(iii)	Kilns for firing ceramic ware.	No	
		R336.1282(2)(a)(iv)	Crucible furnaces, pot furnaces, or induction melting and holding furnaces that have a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	No	
		R336.1282(2)(a)(v)	Bakery ovens and confection cookers where the products are edible and intended for human consumption.	No	
		R336.1282(2)(a)(vi)	Electric resistance melting and holding furnaces that have a capacity of not more than 6,000 pounds per batch and 16,000 pounds per day, which melt only clean charge. Fluxing that results in the emission of any hazardous air pollutant shall not occur in the furnace.	No	
		R336.1282(2)(b)	*Fuel-burning equipment which is used for space heating, service water heating, electric power generation, oil and gas production or processing, or indirect heating and which burns only the following fuels:*	Yes	
		R336.1282(2)(b)(i)	Sweet natural gas, synthetic gas, liquefied petroleum gas, or a combination thereof and the equipment has a rated heat input capacity of not more than 50,000,000 Btu per hour.	Yes	Heaters and boilers (confort heating)
		R336.1282(2)(b)(ii)	Number 1 fuel oil, number 2 fuel oil, distillate oil, the gaseous fuels specified in paragraph (i) of this subdivision, or a combination thereof which contains not more than 0.40% sulfur by weight and the equipment has a rated heat input capacity of not more than 20,000,000 Btu per hour.	No	EUAcetoneReclaim
		R336.1282(2)(b)(iii)	Wood, wood residue, or wood waste which is not painted or treated with wood preservatives, which does not contain more than 25% plywood, chipboard, particleboard, and other types of manufactured wood boards, which is not contaminated with other waste materials, and the equipment has a rated heat input capacity of not more than 6,000,000 Btu per hour.	No	
		R336.1282(2)(b)(iv)	Waste oil or used oil fuels which are generated on the geographical site and the equipment has a rated heat input capacity of not more than 500,000 Btu per hour.	No	
		R336.1282(2)(g)	Sour gas-burning equipment, if the actual emission of sulfur dioxide does not exceed 1 pound per hour.	No	

AI-ROP – Exempt process or process equipment that need to be listed in an administratively complete application for a renewable operating permit
ROP Initial Application
Owens Products, Inc.; Sturgis, MI

R336.1212(4) Unless subject to a process-specific emission limitation or standard, all of the following process or process equipment need only be listed in an administratively complete application for a renewable operating permit. The list shall include a description of the process or process equipment, including any control equipment pertaining to the process or process equipment, the source classification code (SCC), and a reference to the subdivision of this subrule that identifies the process or process equipment:

Company Name Owens Products, Inc.
Date 8/28/2023

Rule	Process/Process Equipment	Exemption Rule #	Specific Exemption	Is process or equipment located at facility?	Notes
R336.1212(4)(d)	Containers	R336.1284(2)(b)	Storage of butane, propane, or liquefied petroleum gas in a vessel that has a capacity of less than 40,000 gallons.	No	
		R336.1284(2)(e)	Storage of sweet crude or sweet condensate in a vessel that has a capacity of less than 40,000 gallons.	No	
		R336.1284(2)(f)	Storage of sour crude or sour condensate in a vessel that has a capacity of less than 40,000 gallons if vapor recovery or its equivalent is used to prevent the emission of vapors to the atmosphere.	No	
		R336.1284(2)(g)	*Storage and handling equipment for gasoline, gasoline blends including ethano diesel fuel, or natural gas as follows.*	No	
		R336.1284(2)(g)(i)	Loading facilities handling less than 20,000 gallons per day for storage, mixing, blending, and handling of gasoline, and/or gasoline/ethanol blends, or for diesel fuel storage and handling.	No	
		R336.1284(2)(g)(ii)**	Dispensing facilities for storage, mixing, blending and handling of gasoline and/or gasoline/ethanol blends, for natural gas storage and handling, or for diesel fuel storage and handling.	No	
		R336.1284(2)(g)(iii)**	Equipment exclusively serving dynamometer facilities for gasoline and/or gasoline/ethanol blends storage and handling, for natural gas storage and handling, or for diesel fuel storage and handling.	No	
		R336.1284(2)(i)	Storage, mixing, blending, or transfer operations of volatile organic compounds or noncarcinogenic liquids in a vessel that has a capacity of not more than 40,000 gallons where the contents have a true vapor pressure of not more than 1.5 psia at the actual storage conditions.	No	
		R336.1284(2)(j)	Pressurized storage of acetylene, hydrogen, oxygen, nitrogen, helium, and other substances, excluding chlorine and anhydrous ammonia in a quantity of more than 500 gallons, that have a boiling point of 0 degrees Celsius or lower.	No	
		R336.1284(2)(n)	Storage of methanol in a vessel that has a capacity of not more than 30,000 gallons.	No	
		R336.1285(2)(g)**	Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input.	No	
		R336.1285(2)(j)	*Portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas and is used fo either of the following:*	No	
		R336.1285(2)(j)(i)	Activities performed on a non-production basis, such as maintenance, repair, and dismantling.	Yes	
		R336.1285(2)(j)(ii)	Scrap metal recycling and/or demolition activities that have emissions that are released only into the general in-plant environment and/or that have externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter.	No	
		R336.1285(2)(l)(vi)(C) (externally vented only)	The following equipment and any exhaust system or collector exclusively serving the equipment: (vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planning, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper stock, wood, or wood products which meets any of the following: (C) Equipment has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by mechanical precleaner.	No	Internally vented plastic trim (router)
		R336.1285(2)(u)	Solvent distillation and antifreeze reclamation equipment that has a rated batch capacity of not more than 55 gallons.	Yes	
		R336.1285(2)(w)	(w) Air strippers controlled by an appropriately designed and operated dual stage carbon adsorption or incineration system that is used exclusively for the cleanup of gasoline, fuel oil, natural gas condensate, and crude oil spills., provided the following conditions are met: (A) For dual stage carbon adsorption, the first canister of the dual stage carbon adsorption is monitored for breakthrough at least once every 2 weeks and replaced if breakthrough is detected. (B) For incineration, a thermal oxidizer (incinerator) is operated at a minimum temperature of 1,400 degrees Fahrenheit in the combustion chamber and a catalytic oxidizer is operated at a minimum temperature of 600 degrees Fahrenheit at the inlet of the catalyst bed. A temperature indication device which continually displays the operating temperature of the oxidizer must be installed, maintained, and operated in accordance with the manufacturer's specifications.	No	

AI-ROP – Exempt process or process equipment that need to be listed in an administratively complete application for a renewable operating permit
ROP Initial Application
Owens Products, Inc.; Sturgis, MI

R336.1212(4) Unless subject to a process-specific emission limitation or standard, all of the following process or process equipment need only be listed in an administratively complete application for a renewable operating permit. The list shall include a description of the process or process equipment, including any control equipment pertaining to the process or process equipment, the source classification code (SCC), and a reference to the subdivision of this subrule that identifies the process or process equipment:

Company Name Owens Products, Inc.
Date 8/28/2023

Rule	Process/Process Equipment	Exemption Rule #	Specific Exemption	Is process or equipment located at facility?	Notes
R336.1212(4)(e)	Miscellaneous	R336.1285(2)(dd)(iii)	Equipment for handling, conveying, cleaning, milling, mixing, cooking, drying,coating, and packaging grain-based food products and ingredients which meet any of the following: (iii)Equipment has externally vented emissions controlled by baghouse, cyclone, rotoclone, or scrubber which is installed, maintained, and operated in accordance with the manufacturer's specifications or the owner or operator shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. The air cleaning device shall be equipped with a device to monitor appropriate indicators 3of performance, for example, static pressure drop, water pressure, and water flow rate	No	
		R336.1285(2)(jj)	Any vacuum truck used at a remediation site as a remedial action method, such as non-emergency response, used in a manner described by any of the following: (i) It is not used more than 2 days in a month without organic compound emission control. (ii) It is not used more than 6 days in a month and organic compound emissions are controlled with at least 90% efficiency.	No	
		R336.1285(2)(mm)	Routine and emergency venting of natural gas from transmission and distribution systems or field gas from gathering lines which meet any of the following: (i) Routine or emergency venting of natural gas or field gas in amounts less than or equal to 1,000,000 standard cubic feet per event. For purposes of this rule, an emergency is considered an unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property or the environment if not controlled immediately. (ii) Venting of natural gas in amounts greater than 1,000,000 standard cubic feet for routine maintenance or relocation of transmission and distribution systems provided that both of the following requirements are met: (A) The owner or operator notifies the department prior to a scheduled pipeline venting. (B) The venting includes, at a minimum, measures to assure safety of employees and the public, minimize impacts to the environment, and provide necessary notification in accordance with the Michigan gas safety standards, the federal pipeline and hazardous materials safety administration standards, and the federal energy regulatory commission standards, as applicable. (iii) Venting of field gas in amounts greater than 1,000,000 standard cubic feet for routine maintenance or relocation of gathering pipelines provided that both of the following are met: (A) The owner or operator notifies the department prior to a scheduled pipeline venting. (B) The venting includes, at a minimum, measures to assure safety of employees and the public, minimize impacts to the environment, and provide necessary notification in accordance with the Michigan department of environmental quality, office of oil, gas and minerals, and the Michigan public service commission standards, as applicable. (iv) Emergency venting of natural gas or field gas in amounts greater than 1,000,000 standard cubic feet per event, provided that the owner or operator notifies the pollution emergency alert system within 24 hours of an emergency pipeline venting. For purposes of this rule, an emergency is considered an unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property or the environment if not controlled immediately.	No	
R336.1212(4)(f)	Surface coating equipment	R336.1287(2)(a)	An adhesive coating line which has an application rate of less than 2 gallons per day and which has emissions that are released only into the general in-plant environment.	No	

AI-ROP – Exempt process or process equipment that need to be listed in an administratively complete application for a renewable operating permit
ROP Initial Application
Owens Products, Inc.; Sturgis, MI

R336.1212(4) Unless subject to a process-specific emission limitation or standard, all of the following process or process equipment need only be listed in an administratively complete application for a renewable operating permit. The list shall include a description of the process or process equipment, including any control equipment pertaining to the process or process equipment, the source classification code (SCC), and a reference to the subdivision of this subrule that identifies the process or process equipment:

Company Name Owens Products, Inc.
Date 8/28/2023

Rule	Process/Process Equipment	Exemption Rule #	Specific Exemption	Is process or equipment located at facility?	Notes
R336.1212(4)(g)	Concrete batch production equipment	R336.1289(2)(d)	A concrete batch plant that meets all of the following requirements: (i) The plant shall produce not more than 200,000 cubic yards per year. (ii) The plant shall use either a fabric filter dust collector, a slurry mixer system, a drop chute, a mixer flap gate, or an enclosure for truck loading operations. (iii) All cement handling operations, such as silo loading and cement weighing hoppers, shall either be enclosed by a building or equipped with a fabric filter dust control. (iv) The owner or operator shall keep monthly records of the cubic yards of concrete produced. (v) Before commencing operations, the owner or operator shall notify the appropriate air quality division district supervisor of the location where the concrete batch plant will be operating under this exemption. (vi) The concrete batch plant shall be located not less than 250 feet from any residential or commercial establishment or place of public assembly unless all of the cement handling operations, excluding the cement silo storage and loading operations, are enclosed within at least a 3-sided structure. (vii) The owner or operator shall implement the following fugitive dust plan: (See RULE 280(dV(vii)(A) - (D)	No	
R336.1212(4)(i)	Emission units that have limited emissions	R336.1291	The requirement of R 336.1201(1) to obtain a permit to install does not apply to any emission unit in which potential emissions meet the conditions listed in subdivisions (a) to (d) of this subrule and table 23 for all air contaminants listed. In addition, records shall be maintained in accordance with subdivisions (e) and (f) of this subrule. (See Rule)	No	
The following equipment has applicable NESHAP/NSPS - therefore: LIST ON EU-003 FORM OF INITIAL APPLICATION LIST IN PART H OF RENEWAL APPLICATION if not already listed in ROP					
R336.1212(4)(e)	Miscellaneous	R336.1285(2)(g)**	Internal Combustion Engines subject to ICE NSPS or RICE NESHAP	No	
R336.1212(4)(d)	Containers	R336.1284(2)(g)	Gasoline Tanks subject to GDF NESHAP	No	
R336.1212(4)(g)	Process or process equipment which has limited emissions	R336.1290	Storage Tank (NSPS Kb)	No	

Table 1 – Potential to Emit Summary

ROP Initial Application

Owens Products, Inc.; Sturgis, Michigan

Pollutant	Combustion Emissions (tpy)	EUGELCOAT	EUFLOWCHOP	EUCLEANUP (Ancilliary)	Annual Emissions (tpy)	PSD Major Source Threshold	Exceeds Major Source Threshold
CO	0.6				0.56	***250***	No
NO_X	0.7				0.67	***250***	No
PM	0.0				0.01	***250***	No
PM_{10}	0.1				0.05	***250***	No
$PM_{2.5}$	0.1				0.05	***250***	No
SO_2	0.0				0.00	***250***	No
VOC	0.0	29.1	15.7	0.8	45.64	***250***	No
CO_2	794.2				794.16	***See CO2e***	
CH_4	0.0				0.01		
N_2O	0.0				0.00		
CO_2e	795.0				794.98	NA	NA
Lead	0.0				0.00	NA	NA
Fluorides	-				-	NA	NA
H_2S	-				-	NA	NA
H_2SO_4	-				-	NA	NA
Styrene		16.7	14.8	0.001	31.48	NA	NA
Methyl Methacrylate		9.7			9.68	NA	NA
Ethylbenzene		1.3	0.4		1.68	NA	NA
Methanol		1.3			1.29	NA	NA
Toluene				0.18	0.18	NA	NA
Cumene				0.01	0.01	NA	NA
Xylene				0.01	0.01	NA	NA
Aggregate HAPs					44.33	NA	NA

Table 2 - Open Molding Emissions Summary; From PTI 399-93D

ROP Initial Application

Owens Products, Inc.; Sturgis, Michigan

										Proposed Permit Limits		Maximum Hourly Emission Rates					Annualized Rates for Modeling	
Product	Permit Reference	Product Classification	UEF Table Application Method	Emissions Factor (lb styrene or MMA emitted/ton or gelcoat processed)[2]	CAS	Emissions Type	Chemical Name	Weight % of Chemical (Permit Limit or SDS Value)	Weight % of Chemical Reference	Annual Material Usage (tons/yr)	Annual Emissions (ton/yr)	Application Rate (oz/min)	Application Rate (lb/min)	Application Rate (lbs/hour)	Application Rate (tons/hr)	Maximum Hourly Emission Rate of Chemical (lbs/hr)	Annualized Rate of Chemical (Total Annual Emissions/8760 hr) for Modeling	Annualized Rate of Chemical gram/sec for Modeling
Gelcoat (EUGELCOAT)																		
Maximum Emission Gel coat	Black/bronze gelcoat	Gel coat, non-tooling	Gel coat non-atomized application (MNA)[4]	259	100-42-5	HAP/VOC	Styrene	40	Permit limit	129	16.71	8	0.500	30	0.0150	3.89	-	-
Maximum Emission Gel coat	All gel coats	Gel coat, non-tooling	Gel coat application (MNA)[5]	150	80-62-6	HAP/VOC	Methyl Methacrylate	10	Permit limit	129	9.68	8	0.500	30	0.0150	2.25	-	-
Maximum Emission Gel coat	Black gel coat	Gel coat, non-tooling	N/A (MNA)	EF= Material Usage x Weight % [3]	100-41-4	HAP/VOC	Ethylbenzene	1	SDS value	129	1.29	8	0.500	30	0.0150	0.30	-	-
Maximum Emission Gel coat	Orange gel coat	Gel coat, tooling	N/A (MNA)	EF= Material Usage x Weight % [3]	67-56-1	HAP/VOC	Methanol	1	SDS value	129	1.29	8	0.500	30	0.0150	0.30	-	-
Resin (EUFLOWCHOP)																		
Maximum Emission Resin	Ceramic resin[6]	Resin	Mechanical non-atomized	77	100-42-5	HAP/VOC	Styrene	35	Permit limit	360	13.86	-	15.0	210	0.1050	8.09	-	-
Maximum Emission Resin	Lamination resin[7]	Resin	Mechanical non-atomized	16.0	25013-15-4	TAC/VOC	Vinyl Toluene	7.5	SDS value	360	2.88		15.0	210	0.1050	1.68	0.658	0.083
Maximum Emission Resin	N/A	Resin	Manual	94	100-42-5	HAP/VOC	Styrene	35	EDS value	20	0.92		1.0	62	0.0310	2.92	-	-
Maximum Emission Resin	N/A	Resin	Manual	EF= Material Usage x Weight % [3]	67-56-1	HAP/VOC	Ethylbenzene	0.02	EDS value	20	0.39		1.0	62	0.0310	0.001	-	-
Catalyst[1] - EUGELCOAT/EUFLOWCHOP																		
Max. Emission Clear Catalyst-EUGELCOAT	N/A	Catalyst (clear)	N/A	EF= Material Usage x Weight % [3]	78-93-3	VOC	Butanone/MEK	5	SDS value	3.23	0.161	-	-	-	2.76E-05	0.06	-	-
Max. Emission Red Catalyst-EUFLOWCHOP	N/A	Catalyst (red)	N/A	EF= Material Usage x Weight % [3]	78-93-3	VOC	Butanone/MEK	5	SDS value	9.00	0.450	-	-	-	7.71E-05	0.15	-	-
Max. Emission Red Catalyst-EUFLOWCHOP	N/A	Catalyst (red)	N/A	EF= Material Usage x Weight % [3]	872-50-4	VOC	N-Methyl-2-pyrrolidone	1	SDS value	12.23	0.122	-	-	-	2.09E-05	0.04	-	-
Miscellaneous Cleaning & Repair (EUCLEAN)																		
Acetone	Miscellaneous cleanup activity	Cleaning solution	N/A	Assume all used is emitted	67-64-1	-	Acetone	100	SDS value	20	20	-	-	-	3.42E-03	6.85	-	-

[1] Hydrogen peroxide emissions not calculated since assumed to be used up in process and/or incorporated into final product.

[2] ACMA-American Composites Manufacturers Association, UEF Emissions Factors for Open Molding and Other Composite Processes.

[3] Calculation methodology obtained from PTI 399-93C, Appendix B and assumes 100% evaporation.

[4] SAR document dated 2/11/15 dictates the use of this UEF product classification.

[5] MNA=Mechanical non-atomized application

[6] Lamination resin used most often has lower styrene content, however ceramic, a higher styrene laminating resin, is assumed for this scenario due to site's desire to utilize more readily available resins containing up to 35% Styrene/HAP.

[7] Although vinyl toluene is less volatile than styrene, the emission factor is derived using the same methodology as styrene since the chemicals are structurally similar except for the addition of a methyl group on vinyl toluene.

[8] AP-42 4.4; Table 4.4-2 Resin Closed Molding

No materials utilized in FRP are categorized as "corrosion-resistant". The manual resin material meets the definition of "High Strenth Resin" per 40 CFR 63 Subpart WWWW (63.5935).

Table 2 - Open Molding Emissions Summary; From PTI 399-93D

ROP Initial Application

Emissions Unit/Pollutant	Proposed Annual Emissions	Existing Permit	Major Source Thresholds	Exceeds Major Source Thresholds?
	Tons			
EUFLOWCHOP (Resin Lamination Process including catalyst usage)				
Styrene	14.8	N/A	N/A	N/A
Ethylbenzene	0.4	NA	NA	NA
Vinyl Toluene	2.9	N/A	N/A	N/A
N-Methyl-2-pyrrolidone	0.1	N/A	N/A	N/A
VOC	15.7	5.3	N/A	N/A
EUGELCOAT (Gelcoat Application Process including catalyst usage)				
Styrene	16.7	N/A	N/A	N/A
MMA	9.7	N/A	N/A	N/A
Ethylbenzene	1.3	N/A	N/A	N/A
Methanol	1.3	N/A	N/A	N/A
VOC	29.1	2.6	N/A	N/A
Acetone	N/A	0.1	N/A	N/A
EUCLEANUP				
VOC	0.8	0.3	N/A	N/A
Styrene	0.001	NA	N/A	N/A
Toluene	0.2	NA	N/A	N/A
Cumene	0.009	NA	N/A	N/A
Xylene	0.009	NA	N/A	N/A
Acetone	20.0	4.5	N/A	N/A
FGFIBERGLASS				
Styrene	31.5	<9.0	10	YES
MMA	9.7	<9.0	10	NO
Total HAPS	44.3	<22.5	25	YES
VOC	45.7	N/A	100	NO

Table 3 - Ancilliary (EUCLEANUP) Usage and Emissions; From PTI 399-93D

ROP Initial Application

Owens Products, Inc.; Sturgis, Michigan

Component	CAS #	Emissions Type	Usage	Max. Gal/Hr	Gal/Yr	Concentration (% wt)	Relative Density	Density	Hourly Emissions (lb/hr)	Annual Emissions (lb/yr)
EUCLEANUP										
IPA (1 Quart Containers)										
Isopropyl alcohol	67-63-0	TAC	1 Quart/Week	0.25	50	99%	0.79	6.59	1.63	326.14
Ethanol	64-17-5	TAC				1%			0.02	3.29
VOC (assumed)						100%			1.65	329.43
Polyester Filler (16 oz. can)										
Talc	14807-96-6	NA	1 Can (16 oz) /Month	0.13	10	40%	1	8.34	--	--
Polyester Polymer	mixture	NA				36%			--	--
Styrene	100-42-5	HAP/TAC				18%			0.02	1.50
Calcium Carbonate	1317-65-3	NA				10%			--	--
Micro- spheres	65997-17-3	NA				10%			--	--
Amorphous Silica	112945-52-5	NA				5%			--	--
905 TR Mold Prep Cleaner										
Toluene	108-88-3	HAP/TAC	0.5 Gallons/Week	0.5	100	52%	0.83	6.92	1.80	359.95
Methyl Ethyl Ketone	78-93-3	TAC				48%			1.66	332.27
VOC (assumed)						100%			3.46	692.22
TR 900 Mold Release										
1,2,4 Trimethylbenzene	95-63-6	TAC	4 Gallons/3 Months	0.1	50	45%	0.892	7.44	0.33	167.38
Solvent naphtha	64742-95-6	TAC				30%			0.22	111.59
1,3,5 Trimethylbenzene	108-67-8	TAC				10%			0.07	37.20
Cumene	98-82-8	HAP/TAC				5%			0.04	18.60
Diethylbenzene	25340-17-4	TAC				5%			0.04	18.60
Xylene	1330-20-7	HAP/TAC				5%			0.04	18.60
VOC (assumed)						100%			0.74	371.96
TR-110 Seal Wax & TR-111 Slurry wax										
Solvent Naphtha	64742-96-7	TAC	4 Gallons/3 Months	0.25	50	50%	0.81	6.76	0.84	168.89
Stoddard Solvent	8052-41-3	TAC				40%			0.68	135.11
VOC (assumed)						90%			1.52	303.99

Notes:

Acetone usage is contained in Appendix B, Table 1 - Open Molding - Emissions Summary

Table 4.A - Combustion Equipment NSR Regulated Pollutant Estimated Emissions

ROP Initial Application

Owens Products, Inc.; Sturgis, Michigan

		EUFURNACES	EUHEATERS
Heat Input Capacity	MMBtu/hr	0.3	1.3
Heat Input Capacity	MMcf/hr	0.0	0.0
Annual Operating Hours	hr/yr	8,760	8,760
Annual Heat Input Limit or Capacity	MMBtu/yr	2,628	10,950
Fuel Heat Value	MMBtu/MMcf	1,020	1,020
Number of Identical Units		1	1

NSR Regulated Pollutant	Emission Factor (See Notes)		Notes	Maximum Short Term Emissions per Unit (lb/hr)	Maximum Short Term Emissions per Unit (lb/hr)	Annual Emissions (tpy)
CO	84	lb/MMCF	1	0.0	0.1	0.6
NO_X	100	lb/MMCF	1	0.0	0.1	0.7
PM	1.9	lb/MMCF	1	0.0	0.0	0.0
PM_{10}	7.6	lb/MMCF	1	0.0	0.0	0.1
$PM_{2.5}$	7.6	lb/MMCF	1	0.0	0.0	0.1
SO_2	0.6	lb/MMCF	1	0.0	0.0	0.0
VOC	5.5	lb/MMCF	1	0.0	0.0	0.0
CO_2	53.1	kg/MMBtu	2	35	146	794
CH_4	1.0E-03	kg/MMBtu	2	0.0	0.0	0.0
N_2O	1.0E-04	kg/MMBtu	2	0.0	0.0	0.0
CO_2e	53.1	kg/MMBtu	2	35	146	795
Lead	5.0E-04	lb/MMCF	3	1.47E-07	6.13E-07	3.33E-06
Fluorides						
H_2S						
H_2SO_4						

[1] Emission factors are from Web-fire for SCC 1-02-006-03 for a Boiler with a heat input capacity of less than 10 MMBtu/hr.

[2] CO_2e global warming potential and emission factors obtained from 40 CFR 98 Subparts A and C, respectively. The global warming potential for CH_4 (25) and N_2O (298) are consistent with the USEPA published changes on November 29, 2013.

[3] Emission factors are from Web-fire for SCC 1-02-006-02 for a Boiler with a heat input capacity of greater than 10 MMBtu/hr.

Table 4.B - Combustion Equipment TAC Emissions

ROP Initial Application

Owens Products, Inc.; Sturgis, Michigan

		EUFURNACES	EUHEATERS
Heat Input Capacity	MMBtu/hr	0.3	1.3
Heat Input Capacity	MMcf/hr	0.0	0.0
Annual Operating Hours	hr/yr	8,760	8,760
Annual Heat Input Limit or Capacity	MMBtu/yr	2,628	10,950
Fuel Heat Value	MMBtu/MMcf	1,020	1,020
Number of Identical Units		1	1

Toxic Air Contaminant	CAS No.	Emission Factor (See Notes)	Notes	Maximum Short Term Emissions per Unit (lb/hr)	Maximum Short Term Emissions per Unit (lb/hr)	Annual Emissions (tpy)	HAP?
Molybdenum	7439-98-7	1.10E-03 lb/MMCF	1	3.24E-07	1.35E-06	7.32E-06	No
Barium	7440-39-3	4.40E-03 lb/MMCF	1	1.29E-06	5.39E-06	2.93E-05	No
Copper	7440-50-8	8.50E-04 lb/MMCF	1	2.50E-07	1.04E-06	5.66E-06	No
Vanadium	7440-62-2	2.30E-03 lb/MMCF	1	6.76E-07	2.82E-06	1.53E-05	No
Zinc	7440-66-6	2.90E-02 lb/MMCF	1	8.53E-06	3.55E-05	1.93E-04	No
Ammonia	7664-41-7	3.20E+00 lb/MMCF	1	9.41E-04	3.92E-03	2.13E-02	No
Dichlorobenzene, mixed isomers	25321-22-6	1.20E-03 lb/MMCF	1	3.53E-07	1.47E-06	7.99E-06	No
Formaldehyde	50-00-0	7.50E-02 lb/MMCF	1	2.21E-05	9.19E-05	4.99E-04	Yes
Benzo (a) pyrene	50-32-8	1.20E-06 lb/MMCF	1	3.53E-10	1.47E-09	7.99E-09	Yes
Dibenzo(a,h) anthracene	53-70-3	1.20E-06 lb/MMCF	1	3.53E-10	1.47E-09	7.99E-09	Yes
3-Methylcholanthrene	56-49-5	1.80E-06 lb/MMCF	1	5.29E-10	2.21E-09	1.20E-08	Yes
Benzo (a) anthracene	56-55-3	1.80E-06 lb/MMCF	1	5.29E-10	2.21E-09	1.20E-08	Yes
Dimethylbenz(a)anthracene	57-97-6	1.60E-05 lb/MMCF	1	4.71E-09	1.96E-08	1.06E-07	Yes
Benzene	71-43-2	2.10E-03 lb/MMCF	1	6.18E-07	2.57E-06	1.40E-05	Yes
Acenaphthene	83-32-9	1.80E-06 lb/MMCF	1	5.29E-10	2.21E-09	1.20E-08	Yes
Phenanthrene	85-01-8	1.70E-05 lb/MMCF	1	5.00E-09	2.08E-08	1.13E-07	Yes
Fluorene	86-73-7	2.80E-06 lb/MMCF	1	8.24E-10	3.43E-09	1.86E-08	Yes
Naphthalene	91-20-3	6.10E-04 lb/MMCF	1	1.79E-07	7.48E-07	4.06E-06	Yes
2-Methyl Naphthalene	91-57-6	2.40E-05 lb/MMCF	1	7.06E-09	2.94E-08	1.60E-07	Yes
Toluene	108-88-3	3.40E-03 lb/MMCF	1	1.00E-06	4.17E-06	2.26E-05	Yes
N-Hexane	110-54-3	1.80E+00 lb/MMCF	1	5.29E-04	2.21E-03	1.20E-02	Yes
Anthracene	120-12-7	2.40E-06 lb/MMCF	1	7.06E-10	2.94E-09	1.60E-08	Yes
Pyrene	129-00-0	5.00E-06 lb/MMCF	1	1.47E-09	6.13E-09	3.33E-08	Yes
Benzo (g,h,i) perylene	191-24-2	1.20E-06 lb/MMCF	1	3.53E-10	1.47E-09	7.99E-09	Yes
Indeno(1,2,3-cd)pyrene	193-39-5	1.80E-06 lb/MMCF	1	5.29E-10	2.21E-09	1.20E-08	Yes
Benzo (b) fluoranthene	205-99-2	1.80E-06 lb/MMCF	1	5.29E-10	2.21E-09	1.20E-08	Yes
Fluoranthene	206-44-0	3.00E-06 lb/MMCF	1	8.82E-10	3.68E-09	2.00E-08	Yes
Benzo (k) fluoranthene	207-08-9	1.80E-06 lb/MMCF	1	5.29E-10	2.21E-09	1.20E-08	Yes
Acenaphthylene	208-96-8	1.80E-06 lb/MMCF	1	5.29E-10	2.21E-09	1.20E-08	Yes
Chrysene	218-01-9	1.80E-06 lb/MMCF	1	5.29E-10	2.21E-09	1.20E-08	Yes
Manganese	7439-96-5	3.80E-04 lb/MMCF	1	1.12E-07	4.66E-07	2.53E-06	Yes
Mercury	7439-97-6	2.60E-04 lb/MMCF	1	7.65E-08	3.19E-07	1.73E-06	Yes
Nickel	7440-02-0	2.10E-03 lb/MMCF	1	6.18E-07	2.57E-06	1.40E-05	Yes
Arsenic	7440-38-2	2.00E-04 lb/MMCF	1	5.88E-08	2.45E-07	1.33E-06	Yes
Beryllium	7440-41-7	1.20E-05 lb/MMCF	1	3.53E-09	1.47E-08	7.99E-08	Yes
Cadmium	7440-43-9	1.10E-03 lb/MMCF	1	3.24E-07	1.35E-06	7.32E-06	Yes
Chromium	7440-47-3	1.40E-03 lb/MMCF	1	4.12E-07	1.72E-06	9.32E-06	Yes
Cobalt	7440-48-4	8.40E-05 lb/MMCF	1	2.47E-08	1.03E-07	5.59E-07	Yes
Selenium	7782-49-2	2.40E-05 lb/MMCF	1	7.06E-09	2.94E-08	1.60E-07	Yes

[1] Emission factors are from Web-fire for SCC 1-02-006-02 because no TAC factors are available for SCC 1-02-006-03.

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Nuisance Minimization Plan

Fiberglass Reinforced Plastic Manufacturing

Owens Products, Inc.
Sturgis, Michigan

2023
Project No. 231461

Table of Contents

List of Appendices

List of Abbreviations/Acronyms

4W	40 CFR Part 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
AQD	Air Quality Division
CFR	Code of Federal Regulations
EGLE	Michigan Department of Environment, Great Lakes, and Energy
FG	flexible group
FRP	fiberglass reinforced plastic
IR	infrared
MACT	Maximum Achievable Control Technology
NMP	Nuisance Management Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
PTI	Permit to Install
RV	recreational vehicle
VOC	volatile organic compound

1.0 Introduction

Owens Products, Inc. (Owens) was issued air Permit to Install (PTI) No. 399-93D on September 14, 2022, covering the manufacture of fiberglass reinforced plastic (FRP) at their facility in Sturgis, Michigan. Owens manufactures after-market running boards, aluminum tool and dog boxes, step bumpers, and fiberglass reinforced plastic components for the recreational vehicle (RV) industry. No painting is completed at the facility. Permitted operations consist of resin lamination and gelcoat application processes, cutting/sanding of modeled materials with fabric filter control, and miscellaneous cleanup activities using acetone.

2.0 Background

Odors have been identified with the use of styrene. The purpose of this Nuisance Management Plan (NMP) is to describe site-specific provisions that will be established by Owens to manage and minimize potential odors for their FRP production facility. A process description is included in this NMP, identifying potential sources of odor as well as the specific work practices and air pollution control that will be used to minimize odors.

2.1 Process Description

Owens manufactures after-market running boards, aluminum tool and dog boxes, step bumpers, and fiberglass reinforced plastic components for the RV industry. The fabrication of FRP composite products is performed at the facility via the open molding process. The production process follows the following steps:

- Polyester-based gelcoat is first applied to the mold at a typical thickness of 18-mills to produce the exterior finish. The gelcoat is applied in a spray booth with a non-atomized gun.
- After drying, the part is sprayed with lamination resin and fiberglass using flow chop guns to reinforce the product. The polyester resin with chopped fiberglass is applied to the mold at an approximate thickness of 0.08 inches in another spray booth.
- After the materials have cured, the finished product is removed from the mold and moved to the trim area for sanding/trimming of any excess material. The trimming operations are controlled by a booth with fabric filter which exhausts into the general in-plant air.
- The final product is then packed for distribution and shipped.

The existing equipment/process is comprised of four identified emission units: EUFLOWCHOP, EUGELCOAT, EUTRIM, and EUMISC. EUFLOWCHOP, EUGELCOAT, and EUMISC are organized into the flexible group (FG) FGMACTWWWW and are relevant to this NMP.

2.2 Facility Location

The Owens facility is located at 1107 Progress Street, Sturgis, Michigan. The building is on the northeast corner of Progress Street and Broadway Street. To the southeast lies a residential neighborhood, and to the east a public park complex. The residential neighborhood lies primarily along W West Street and N Centerville Street.

2.3 Air Pollution Control

Volatile organic compounds (VOCs) like styrene are emitted from fresh resin and gelcoat surfaces during the fabrication process, and from the use of solvents (i.e., acetone) for cleanup. Organic vapor emissions from polyester resin/fiberglass processes occur when the cross-linking agent (monomer) contained in the liquid resin/gelcoat evaporates into the air during application and curing. Since emissions result from evaporation of monomer from the uncured resin/gelcoat, they depend upon the amount of resin/gelcoat surface exposed to the air and the time of exposure. Thus, the potential for emissions varies with the manner in which the material is mixed, applied, handled, and cured. These factors vary among the different fabrication processes such as

mechanical non-atomized or atomized spray applications. Use of resins and gelcoats with a lower styrene content also lowers overall emissions.

The spray booths associated with EUGELCOAT and EUFLOWCHOP are equipped with dry filter overspray control systems and atomized applicator guns for material applications. Emissions from cleanup solvents can be controlled through good housekeeping and use practices, reclamation of spent solvent, and substitution with water-based solvent substitutes. Acetone will be used at Owens for cleanup.

3.0 Regulatory and Permit Analysis

Owens uses gelcoats and resins that contain styrene to produce its products. The use of these materials associated with FGMACTWWWW can create an unpleasant odor that could be noted by neighbors in the area where the facility is located.

3.1 Michigan Air Pollution Control Regulations

In Michigan, odors are regulated as a nuisance under Michigan Air Pollution Control Rule 901, that states:

> *Notwithstanding the provisions of any other department rule, a person 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.*
>
> *(b) Unreasonable interference with the comfortable enjoyment of life and property.*

3.2 Air Quality Policy and Procedure 21

Michigan Air Policy and Procedure 21, *Application of Rule 901(b) in the Permit to Install Review Process* (AQD-21) outlines requirements for reviewing the potential for a nuisance in a prospective project, as well as provides information on developing an NMP. Recommended elements include:

A. Introduction, including process description, permit number, and background information
B. Potential sources of odor and control equipment, if applicable
C. Maintenance schedule
D. Housekeeping measures
E. Odor notification, investigation, and response

3.3 Michigan PTI No. 399-93D

PTI 399-93D EUFLOWCHOP, Section III.4; EUGELCOAT Section III.4; and EUMISC, Section III.3 require Owens to develop and implement this NMP. The PTI also specifies that it must contain, at a minimum:

> *a) Procedures for maintaining and operating equipment in a manner that minimizes the release of odors to the outside air;*
>
> *b) Procedures that shall be taken to address outdoor complaints; and*
>
> *c) A plan for corrective action to address any releases to outside air.*

3.4 Amendment of the NMP

If the NMP fails to address or inadequately addresses odor management, Owens will amend this plan within 30 days. Owens will also update the plan if new equipment installation may affect odor, or if requested to do so by the EGLE Air Quality Division (AQD) District Supervisor.

4.0 Odor Control Measures

At a facility like this, the primary source of odors would be expected from handling of the styrene-containing resin and gelcoats. Good housekeeping and maintenance will ensure that styrene odors and emissions do not become a nuisance. Proper operation of the ventilation system will ensure that emissions are properly dispersed.

VOCs are emitted from fresh resin and gelcoat surfaces during the FGMACTWWWW fabrication process, and from the use of solvents (acetone) for cleanup. Organic vapor emissions from polyester resin/fiberglass fabrication processes occur when the cross-linking agent (monomer) contained in the liquid resin/gelcoat evaporates into the air during application and curing. Styrene, methyl methacrylate, and vinyl toluene are three of the principal monomers used as cross-linking agents. Styrene is by far the most common.

Since emissions and, therefore, odors result from evaporation of monomer from the uncured resin/gelcoat, they depend upon the level of surface exposed to the air and the time of exposure. Thus, the potential for emissions varies with the manner in which the resin/gelcoat is mixed, applied, handled, and cured.

4.1 Ventilation System (SVFLOWCHOP, SVGELCOAT)

Styrene has a sweet odor that can be detected at levels as low as 0.04 ppm[1]. General ventilation is a common engineering control measure and can be used to minimize odors from resin and gelcoat. The spray booths associated with EUGELCOAT and EUFLOWCHOP are equipped with dry filter overspray control systems and atomized applicator guns for material applications. These emission units exhaust to the outdoors from stacks (SVGELCOAT and SVFLOWCHOP) at the height specified by the Permit.

4.2 Maintenance

The exhaust system for the FGMACTWWWW process will be regularly maintained as recommended by the manufacturer. Regular maintenance includes periodic monitoring of the equipment and replacement of filters to ensure that adequate flow occurs. On a quarterly basis, the following are inspected and performed:

- Inspect for obstructions and deterioration
- Repair all leaks and cracks
- Verify fan performance
- Inspect and grease bearings
- Check fan belts for tension and wear; replace as necessary
- Check sheaves for alignment; adjust as necessary
- Check fan shaft and wheel; adjust as necessary
- Balance fan wheel, if required
- Check draw at hoods
- Check steel base for corrosion

Filter changes and monitoring of differential pressure will occur more frequently.

[1] https://nj.gov/health/eoh/rtkweb/documents/fs/1748.pdf

4.3 Container Management

Styrene is reactive with strong acids and metal salts. Styrene attacks rubber, copper, and copper alloys, so it should be stored in suitable containers that are tightly closed and properly grounded to ensure static electricity will not accumulate. One of the best ways to mitigate odor is to ensure that chemical containers stay closed unless directly in use. Drums, totes, or tanks will be tightly closed containers and will be stored in a manner to minimize leaks.

4.4 Housekeeping

To best control odors, several specific routine housekeeping procedures will be followed including:

- Storage of all raw materials and waste in their proper areas on spill pallets, as needed
- Disposal of resin/gelcoat-containing debris and rags in labeled closed containers
- Ensuring product chemical drums and buckets are closed when not in use
- Keeping waste in closed containers and recycling or disposing of it quickly
- Immediate cleanup of any spills or leaks

5.0 Addressing Complaints

Odors associated with handling styrene monomer and styrene-based polyester resin and gelcoat are well documented. While the air permit issued by the EGLE Air Quality Division will ensure that styrene emissions meet the appropriate health-based standards, odors can be subjective; and even emissions that meet health-based standards may still present a nuisance to neighbors. Odors that present a nuisance can be eliminated or mitigated in several ways, beginning with an odor investigation.

Maintaining a good relationship with their neighbors is important to Owens and the key to this relationship is ensuring that odors do not bother the neighbors. Owens is establishing a program where if odors are noted, they can be quickly addressed. This will help maintain a good relationship with the neighbors and ensure that odor complaints are not lodged with EGLE.

To facilitate ready communication with the facility, the name of the facility and its phone number will be posted on each door.

The following numbers will be posted initially and updated if needed:

- During Business Hours: 877.904.3391 or 269.651.2300

This will enable complainants to speak with a facility representative, in the event that they have an odor complaint, and will also help eliminate the source of odors.

If a complaint is registered, the following information will be collected from the complainant, where possible:

- Time of the odor
- Location of the odor
- Description of the odor
- Severity of the odor
- Return phone number and/or email of the complainant

Appendix 1 includes a form that can be used to record information on the odor and will allow follow-up by Owens. Subsequent to the report, Owens will undergo an internal investigation to attempt to validate the report and evaluate the need for corrective actions. This would be especially useful in the event that the complaint was also logged by EGLE.

In the event that complaints are received by Owens, Fishbeck proposes a phased approach where additional measures are taken until it appears that the odors have been addressed.

First, a complete investigation will be initiated for each complaint and results will be documented. The following information can be used to assess the odor:

- Production processes and materials usage at the time of the report.
- Meteorological data at the time of the report, such as wind speed and direction, precipitation, etc.
- Any unusual projects or work being completed at the time of the report.
- A visual inspection of the ventilation system.
- A visual inspection of adjacent properties from public rights-of-way, to observe if any unusual operations or conditions exist.

In the event that odors are confirmed, several options are available to Owens to reduce odors from the resin and gelcoat. These include improving housekeeping, raising the stack height, upgrading the ventilation system, or the use of masking agents. If necessary, this NMP will be updated.

6.0 Malfunction Reporting

Under Rule 912, Owens must have a system to report start-up, shutdowns, or malfunctions that result in excess emissions. As the ventilation system will be installed primarily for odor control, there is not likely a scenario in which failure to operate the control equipment will result in excess emissions. To ensure compliance with Rule 901, Owens will monitor the process for a bypass or failure of its ventilation systems. If that bypass or failure lasts more than two hours and results in excess emissions, Owens will report the malfunction to the EGLE District Office in Kalamazoo (269.567.3500). This report can be phoned in, emailed, or faxed and should be made as soon as possible, and must be made within two days of the incident or discovery. Information regarding the incident must include the date, time, and specific process equipment operating, as well as control equipment operating, nature of the issue, and corrective measures being taken. Within ten days of the incident or its discovery, a written report must be submitted to:

Michigan Department of Environment, Great Lakes and Energy
Air Quality Division – Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009-5025
269.567.3500
24-hour Pollution Emergency Alert System 800.292.4706

The report must include:

- Date and time of incident
- Probable causes or reasons for the incident
- Information regarding the process equipment operating at the time of incident and an estimate of excess emissions, if possible
- Summary of actions taken to correct and prevent a recurrence

Appendix 1

ODOR COMPLAINT LOGGING FORM

For internal use only.

To be completed by the Plant Manager when receiving a complaint

Date _____ Time of Report _____ Complainant _____

Address and Phone Number of Complainant _____

Description of Odor_____

Time Incident was Detected _____ a.m./p.m. Duration of Event _____

Has this happened before? How often? _____

Weather Conditions Sunny/Overcast/Other ____ Temperature ____

Weather Conditions Precipitation _____ Wind Direction/Speed _____

Are there weather conditions or times the odor seems more noticeable? _____

Are there certain days of the week its more noticeable? _____

Plant Conditions

Current Production _____

Materials in Use _____

Housekeeping and Maintenance Proper? _____

Ventilation System Operating Properly? _____

Actions Taken and Time _____

Comments or Recommendations _____

Form Completed by and date _____

Follow-up with Complainant and date _____