

Puite, Tammie (EGLE)

From: Nick Spivey <NSpivey@flexngate.com>
Sent: Tuesday, October 15, 2019 9:43 AM
To: EGLE-ROP
Subject: A5764-ROP Renewal Application
Attachments: ROP Renewal Application- Signed.pdf; Ventra Evert Existing ROP_Mark-up.docx; A001 PTE HAPs.dot; PTE Summary.pdf; A001 Plans.dot; A5764 CAM Plan.docx; SSMP-MAP 2018_updated 2019.doc

Please find attached all documents associated with the ROP Renewal Process.

ROP application form- signed.
ROP mark-up
Supplemental data
Plans

Thank you!

*Nick Spivey
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Ventra Evert, LLC
A Division of Flex-N-Gate Corporation
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Evert, Michigan 49631
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RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

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

GENERAL INSTRUCTIONS

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

PART A: GENERAL INFORMATION

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

SOURCE INFORMATION

SRN A5764	SIC Code 3714	NAICS Code 336399	Existing ROP Number MI-ROP-A5764-2015c	Section Number (if applicable)
Source Name Ventra Evert, LLC				
Street Address 601 West Seventh Street				
City Evert	State MI	ZIP Code 49631	County Osceola	
Section/Town/Range (if address not available)				
Source Description Ventra Evert is a manufacturer of interior and exterior automotive trim components. On-site operations include plastic injection molding, manual and robotic painting, assembly, sequencing, and other related operations.				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

OWNER INFORMATION

Owner Name	Section Number (if applicable)			
Mailing address (<input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
<input type="checkbox"/> Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.				

PART A: GENERAL INFORMATION (continued)

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

CONTACT INFORMATION

Contact 1 Name Nichalos Spivey		Title EHS Manager		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 231-734-9000		E-mail address nspivey@flexngate.com		

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

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name Ron Howard		Title General Manager		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 231-734-9000 Ext. 49224		E-mail address rhoward@ventra.us		

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

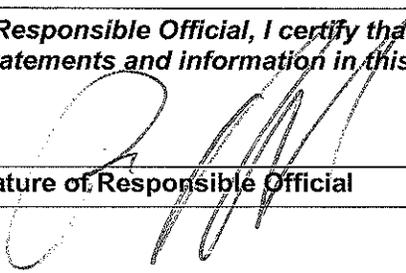
<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

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

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

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

Name and Title of the Responsible Official (Print or Type)	
Ron Howard, General Manager	
<i>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.</i>	
	10/15/19
Signature of Responsible Official	Date

PART C: SOURCE REQUIREMENT INFORMATION

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

C1. Actual emissions and associated data from <u>all</u> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <u>not</u> been reported in MAERS for the most recent emissions reporting year? If <u>Yes</u> , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C3. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If <u>Yes</u> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
C4. Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO2, VOC, lead) emissions? If <u>Yes</u> , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If <u>No</u> , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5. Has this stationary source <u>added or modified</u> equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If <u>Yes</u> , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <u>must</u> be included in HAP emission calculations. If <u>No</u> , HAP potential emission calculations do not need to be included.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C6. Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <u>Yes</u> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7. Are any emission units subject to the federal Acid Rain Program? If <u>Yes</u> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
C8. Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <u>Yes</u> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to the MDEQ, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <input type="checkbox"/>
C9. Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If <u>Yes</u> , then a copy must be submitted as part of the ROP renewal application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C10. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If <u>Yes</u> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-PTE HAPs & AI Plans	

PART F: PERMIT TO INSTALL (PTI) INFORMATION

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

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

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

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

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

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

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

Comments:

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

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

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

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.
 If Yes, identify the emission units in the table below. If No, go to Part H. Yes No
Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

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

Comments:

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

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

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

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

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

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

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

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

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

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

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

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

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

**KEEP ALL CONDITIONS
NO CHANGES, ADDITIONS, OR DELETIONS**

EFFECTIVE DATE: April 27, 2015
REVISION DATES: August 25, 2015; December 5, 2016, August 2, 2018

ISSUED TO:
**Ventra Travel Holdings Corporation
Ventra Evart, LLC**

State Registration Number (SRN): A5764

LOCATED AT:

601 West Seventh Street, Evart, Osceola County, Michigan 49631

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-A5764-2015c

Expiration Date: April 27, 2020

Administratively Complete ROP Renewal Application Due Between:
October 27, 2018 and October 27, 2019

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-A5764-2015c

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

Shane Nixon, Cadillac/Gaylord District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order Number 16-2009 entered on August 17, 2009 between the MDEQ and the permittee.

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

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

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

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

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

Permit Shield

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

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

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

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	Less than 225 tpy*, ²	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
* Beginning upon permit issuance, and continuing for the first 12 calendar months, this limit applies to the cumulative total VOC emissions. Thereafter, the limit shall become a 12-month rolling limit.					

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205)
2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a. Gallons or pounds of each VOC containing material used.
 - b. Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c. VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
 - d. VOC emission calculations determining the monthly emission rate of each in tons per calendar month for FGFACILITY.
 - e. VOC emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month for FGFACILITY.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(3))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUFASCIA-LINE	Fascia line is used to apply adhesion promoter, base coat, and clear coat to fascia. There are automatic (robot) and manual booths for each coating type. Automatic booths are vented through a water curtain followed by a regenerative thermal oxidizer (RTO). Manual booths have dry fabric filters. (PTI No. 87-15)	11/27/02	FGMACT-PPPP
EUFIREPUMP1	A 130HP diesel fuel-fired, Compression Ignition engine used to power the building emergency fire suppression water pump.	04/96	NA
EUBOILER1	1.82 MMBTU natural gas fired boiler used to keep the fire suppression water above freezing.	01/97	NA
EUDBOOTH-4698	Single dry filter spray booth and Area D drying oven, controlled by dry fabric filters. (PTI No. 87-15)	06/30/93	FGMACT-PPPP
EUCOLDCLEANER	Any new cold cleaner (placed into operation after 07/01/1979) that is exempt from NSR permitting by R 336.1281(h) or R 336.1285 (r)(iv).	NA	FGCOLDCLEANERS
EURULE290	Generally, all equipment that is exempt from the requirement to obtain a Permit to Install pursuant to R 336.1290.	NA	FGRULE290
EJAM3800	Generally, all equipment that is exempt from the requirement to obtain a Permit to Install pursuant to R 336.1287(c). Specifically, the quality control lab spray booth, Asset # AM3800.	NA	FGRULE287(c)

**EUFASCIA-LINE
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Fascia line is used to apply adhesion promoter, base coat, and clear coat to fascia. There are automatic (robot) and manual booths for each coating type. Automatic booths are vented through a water curtain followed by a RTO. Manual booths have dry fabric filters. (PTI No. 87-15)

Flexible Group ID: FGMACT-PPPP, FGFACILITY

POLLUTION CONTROL EQUIPMENT

Fabric Filters, Water Curtain, RTO

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile Organic Compounds (VOC)	168.3 pounds per hour ²	Test Protocol*	EUFASCIA-LINE	SC V.3	40 CFR 52.21(j) R 336.1702(a) R 336.1225 (Consent Order AQD No. 16-2009)
2. Volatile Organic Compounds (VOC)	135 tons per year ²	12-month rolling time period as determined at the end of each calendar month	EUFASCIA-LINE	SC VI.8	40 CFR 52.21(j) R 336.1702(a) R 336.1225 (Consent Order AQD No. 16-2009)

* Test protocol shall specify averaging time.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Adhesion Promoter	1.0 lb VOC/gal (minus water) ^a as applied, after controls ²	Daily volume-weighted average	EUFASCIA-LINE	SC V.1 SC VI.2 SC VI.5	40 CFR 52.21(j) R 336.2810 R 336.1702(a)
2. Basecoat	0.7 lb VOC/gal (minus water) ^a as applied, after controls ²	Daily volume-weighted average	EUFASCIA-LINE	SC V.1 SC VI.2 SC VI.5	40 CFR 52.21(j) R 336.2810 R 336.1702(a)
3. Clearcoat	0.7 lb VOC/gal (minus water) ^a as applied, after controls ²	Daily volume-weighted average	EUFASCIA-LINE	SC V.1 SC VI.2 SC VI.5	40 CFR 52.21(j) R 336.2810 R 336.1702(a)

^a The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the EUFASCIA-LINE unless a minimum temperature of 1400 °F and a minimum retention time of 0.5 seconds in the combustion chamber of the RTO is maintained.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
2. The permittee shall maintain a minimum overall VOC control efficiency (combined capture and destruction efficiency) of 86% across EUFASCIA-LINE.² (40 CFR 52.21(j), R 336.2810, R 336.1910, R 336.1702(a), R 336.1225, R 336.1205)
3. The permittee shall not operate the fascia line unless all automatic booth water wash equipment is installed and operating properly.² (R 336.1910, R 336.1301(1)(c))
4. The permittee shall not operate the fascia line unless all manual booth dry filters are installed and operating properly.² (R 336.1910, R 336.1301(1)(c))
5. The permittee shall not operate EUFASCIA-LINE unless the RTO is installed and operating properly in accordance with the MAP.² (40 CFR 52.21(j), R 336.2810, R 336.1911, R 336.1910, R 336.1702(a), R 336.1205)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. All coating applicators shall be properly installed maintained and operated according to manufacturer's specifications.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
2. The permittee shall use either electrostatic guns or bells for automatic and manual booth application of adhesion promoter, basecoat, and clearcoat coatings. The spray guns for all coating application will be either HVLP applicators, multi-port spray equipment, or equivalent technology with comparable transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
3. The combustion chamber of the RTO shall have a minimum retention time of 0.5 seconds.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a), R 336.1205)
4. The permittee shall install a device to monitor and record the inlet static duct pressure of the RTO. (R 336.1213(3)(b)(ii), 40 CFR 64.4(e))

V. TESTING/SAMPLING

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

1. The VOC content of coatings, as applied, minus water, shall be tested on an annual basis using USEPA Method 24. The five most frequently used coatings plus five random coatings shall be tested.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
2. Upon prior written approval by the AQD District Supervisor, the VOC content of coatings may be determined using manufacturers formulation data.² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
3. The permittee shall verify, by testing at the owner's expense, control efficiency (capture and destruction) of the RTO, and the VOC emission rate, in pounds per hour, for EUFASCIA-LINE every five years, using a method approved by the AQD.² (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)
4. The permittee shall conduct performance testing to correlate the VOC emission rate in lbs/hr with the inlet static duct pressure. Monitoring, based on the performance tests, shall begin no later than 180 days after issuance of the ROP. (40 CFR 64.4(e), 40 CFR 64.6(d))

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall **keep a record of the identification and the coating category (adhesion promoter, basecoat, or clear coat) for each coating used.**² (40 CFR 52.21(j), Consent Order AQD No. 16-2009, R 336.2810, R 336.1702(a))
2. The permittee shall **keep a record of the VOC content in pounds per gallon of coating (minus water) as received and as applied for each coating category (adhesion promoter, basecoat, or clear coat) and for each coating used.**² (40 CFR 52.21(j), R 336.2810, R 336.1702(a), Consent Order AQD No. 16-2009, and 40 CFR, Part 60, Appendix A, Method 24)
3. The permittee shall **keep a record of the VOC content in pounds per gallon of reducers and catalysts used.**² (40 CFR 52.21(j), R 336.2810, R 336.1702(a), Consent Order AQD No. 16-2009, and 40 CFR, Part 60, Appendix A, Method 24)
4. The permittee shall **keep a daily record of the amount, in gallons, of coating applied.**² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
5. The permittee shall **calculate and keep daily records of the volume weighted average VOC content (after controls) as applied for each coating category (adhesion promoter, basecoat, or clear coat), using the methods detailed in Appendix 7 or an acceptable method approved by the District Supervisor.**² (40 CFR 52.21(j), R 336.1702(a), R 336.2810, and Consent Order AQD No. 16-2009)
6. The permittee shall **keep a monthly record of the amount, in gallons, of cleanup and purge solvents used and reclaimed.**² (40 CFR 52.21(j), R 336.2810, R 336.1702(a))
7. The permittee shall **utilize the RTO combustion chamber temperature as an indicator of proper function of the RTO.** The appropriate range of temperature defining proper operation of the RTO is 1400°F to 1600°F. (40 CFR 64.6(c)(1)(i),(ii))
8. The permittee shall **utilize RTO inlet static duct pressure as an indicator of proper function of the capture system.** The appropriate inlet static duct pressure defining proper operation of the capture system shall be determined through performance testing. The current indicator range is between 0.47 inches water column to 0.72 inches water column while EUFASCIA-LINE is operating. (40 CFR 64.6(c)(1)(i),(ii))
9. The permittee shall **monitor and record the temperature in the RTO combustion chamber on a continuous basis and maintain continuous records of the temperature in the RTO.**² (40 CFR 52.21(j), R 336.2810, R 336.1205, R 336.1702(a), 40 CFR 64.6(c)(1)(iii))
10. The permittee shall **monitor the RTO inlet static duct pressure on a continuous basis and record the static duct pressure at least once every 15 minutes while EUFASCIA-LINE is operating.** (40 CFR 64.6(c)(1)(iii))
11. The permittee shall **calculate and record the VOC emission rates using the formulas in Appendix 7 to determine VOC emission rates in pounds per hour, tons per month, and tons per 12-month rolling time period as determined at the end of each calendar month.** (R 336.1213(3), and Consent Order AQD No. 16-2009)
12. The permittee shall **calculate and record the VOC emission rates in tons per month, and tons per 12-month rolling time period as determined at the end of each calendar month.** (40 CFR 52.21(j), R 336.2810, R 336.1702(a), R 336.1225, Consent Order AQD No. 16-2009)

13. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks, required zero, and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that EUFASCIA-LINE is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64, compliance including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
14. The permittee shall use the RTO temperature to assure compliance with the VOC limit. An excursion for VOC shall occur if the RTO temperature measured in the combustion chamber is less than 1425 °F while EUFASCIA-LINE is operating. **(40 CFR 64.6(c)(2))**
15. The permittee shall use the RTO inlet static duct pressure to assure compliance with the VOC limit. An excursion for VOC shall occur if the static duct pressure at the inlet of the RTO is less than the level determined through performance testing while EUFASCIA-LINE is operating. **(40 CFR 64.6(c)(2))**
16. Upon detecting an excursion or exceedance, the permittee shall restore operation of EUFASCIA-LINE (including RTO and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The permittee shall document the actions taken to restore normal operation. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). In response to an excursion of the combustion chamber temperature less than 1425 °F or the static duct pressure at the inlet of the RTO less than 0.52 inches water column based on a three hour average while EUFASCIA-LINE is operating, the permittee shall refer to the monitoring requirements outlined in the MAP. **(40 CFR 64.7(d))**
17. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
18. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Quarterly reporting demonstrating compliance with applicable VOC emission and content limits shall be submitted to the District Supervisor within 30 days following the end of a calendar quarter in which the data were collected.² **(40 CFR 52.21(j), R 336.2810, R 336.1702(a), Consent Order AQD No. 16-2009)**
5. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test

date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. **(R 336.12001(3), R 336.1213(3))**

6. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4) R 336.1213(3))**
7. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5), 40 CFR 63.4520(b), R 336.1213(3))**
8. Results of VOC content testing shall be submitted to the AQD District Supervisor within 30 days of the completion of testing.² **(40 CFR 52.21(j), R 336.2810, R 336.1702(a))**
9. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
10. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-FL-ADHES-MAN	48 ²	58 ²	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
2. SV-FL-BASE-MAN	56 ²	58 ²	R 336.1225 R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
3. SV-FL-CLEAR-MAN	48 ²	58 ²	R 336.1225 R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
4. SV-FL-THERMAL-OX	82 ²	58 ²	R 336.1225 R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

1. All purge solvents and coating from all coating applicators used in the fascia line shall be captured and stored in closed containers and disposed of in an acceptable manner.² **(R 336.1702(a))**
2. The permittee shall comply with all applicable requirements of 40 CFR, Part 64. **(40 CFR, Part 64)**

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

Footnotes:

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

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

**EUFIREPUMP1
 EMISSION UNIT CONDITIONS**

DESCRIPTION

An emergency diesel fuel-fired (compression ignition) reciprocating internal combustion engine (RICE) rated at 130 horsepower located at a major source of HAP emissions, used to power the building emergency fire suppression water pump.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee may operate EUFIREPUMP as necessary during emergencies with no time limit. **(40 CFR 6640(f)(1))**
2. The permittee shall minimize the time spent at idle and minimize start-up to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. **(40 CFR 63.6602, 40 CFR 63.6625(h), and 40 CFR, Part 63, Subpart ZZZZ, Table 2c, Item 1)**
3. The permittee must comply with the following operational requirements:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in Condition III.4;
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace if necessary;
 - c. Inspect all hoses and belts every 500 hours or operation or annually, whichever comes first, and replace if necessary.

If EUFIREPUMP is operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended. The permittee must report any failure to perform the work practice on the schedule required. **(40 CFR 63.6602, and 40 CFR, Part 63, Subpart ZZZZ, Table 2c, Item 1)**

4. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition III.3. The oil analysis program must be performed at the same frequency specified for changing the oil in Condition III.3. The oil analysis shall test for the following limits:
 - a. Total Base Number is less than 30% of the Total Base Number of the oil when new;
 - b. Viscosity of the oil has changed by 20% from the viscosity of the oil when new;
 - c. Percent water content (by volume) is greater than 0.5%.If any of the limits are exceeded, the permittee must change the oil within two days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee must change the oil within two days or before commencing operation, whichever is later. The analysis program must be part of the maintenance plan for EUFIREPUMP. **(40 CFR 63.6625(i))**
5. The permittee must be in compliance with the emission limitations, operating limitations, and other requirements in 40 CFR, Part 63, Subpart ZZZZ that apply to EUFIREPUMP at all times. **(40 CFR 63.6605(a))**
6. The permittee at all times must operate and maintain EUFIREPUMP in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by 40 CFR, Part 63, Subpart ZZZZ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the EUFIREPUMP. **(40 CFR 63.6605(b))**
7. The permittee must operate and maintain EUFIREPUMP according to the manufacturer's emission-related written operation and maintenance instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a), and 40 CFR, Part 63, Subpart ZZZZ, Table 6, Item 9)**
8. The permittee may operate EUFIREPUMP for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the engine manufacturer or vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing is limited to 100 hours per year. **(40 CFR 63.6640(f)(2)(i))**
9. The permittee may operate EUFIREPUMP for up to 50 hours per engine per year in non-emergency situations, which are counted as part of the 100 hours of operation allowed under Condition III.8. **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip EUFIREPUMP with a non-resettable hour meter. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep the following records: **(40 CFR 63.6655)**
 - a. A copy of each notification and report submitted to comply with 40 CFR, Part 63, Subpart ZZZZ, including all documentation supporting any initial Notification or Notification of Compliance Status, according to the requirements of 40 CFR 63.10(b)(2)(xiv).
 - b. Records of the occurrence and duration of each malfunction of operation.
 - c. Records of actions taken during period of malfunctions to minimize emissions in accordance with 40 CFR 63.6605(b) including, corrective actions to restore malfunctioning equipment to its normal or usual manner of operation.
 - d. Records of the maintenance conducted on EUFIREPUMP in order to demonstrate that EUFIREPUMP is operated and maintained according to the maintenance plan.

- e. Records of the hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation (including what classified the operation as an emergency) and how many hours were spent during non-emergency operation.
 - f. Records to demonstrate continuous compliance with the operating limitations in SC III.7.
2. The permittee shall keep records of the parameters that are analyzed as part of the oil analysis program in SC III.4, the results of the analysis, and the oil changes for the engine. (40 CFR 63.6625(j))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i), 40 CFR 63.6640(b), 40 CFR 63.6650(f))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

EUBOILER1
EMISSION UNIT CONDITIONS

DESCRIPTION

A 1.82 MMBTU natural gas-fired boiler used to keep the fire suppression system water above the freezing point.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall complete an initial tune-up by following procedures described in 40 CFR 63.7540(a)(10)(i) through (vi) no later than January 31, 2016. **Subsequent tune-ups must be completed every 5-years of the initial compliance date of January 31, 2016**, but must be conducted no more than 61 months after the previous tune-up. **(40 CFR 63.7510(e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12), and 40 CFR Part 63, Subpart DDDDD, Table 3.1)**
2. The permittee shall complete a one-time energy assessment specified in 40 CFR Part 63, Subpart DDDDD, Table 3.4(a) through (h) no later than January 31, 2016. **(40 CFR 63.7510(e), and 40 CFR Part 63, Subpart DDDDD Table 3.4)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

1. **Prompt reporting of deviations** pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. **Semiannual reporting of monitoring and deviations** pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. **Annual certification of compliance** pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit an initial notification of compliance (NOC) within 60 days of completing all compliance demonstrations. The following shall be submitted in the NOC Report: **(40 CFR 63.7545(c))**
 - a. A signed statement in the NOC report that indicates the permittee conducted a tune-up. **(40 CFR 63.7530(d))**
 - b. A signed certification that an energy assessment was completed according to 40 CFR Part 63, Subpart DDDDD, Table 3 and is an accurate depiction of the facility at the time of the assessment. **(40 CFR 63.7530(e))**
5. **The permittee shall submit an initial compliance report, no later than January 31, 2021** as described in 40 CFR 63.7550(b). The compliance report shall include the following information: **(40 CFR 63.7550(b))**
 - a. Company name, facility name, and address.
 - b. Process unit information, emission limitations and operating parameter limitations.
 - c. Date of report and beginning and ending dates of the reporting period.
 - d. The total operating time during the reporting period.

The date of the most recent tune-up for EUBOILER1 and the most recent burner inspection if it was not inspected annually, biennially, or on a 5-year schedule, and was delayed until the next unit shut-down.
6. **The permittee shall submit subsequent compliance reports every 5 years.** No later than January 31st. **(40 CFR 63.7550(b))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. Permittee shall comply with all applicable requirements of 40 CFR, Part 63, Subpart DDDDD by January 31, 2016. **(40 CFR, Part 63, Subpart DDDDD)**

Footnotes:

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

**EUDBOOTH-4698
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Single dry filter spray booth and Area D drying oven, controlled by dry fabric filters.

Flexible Group ID: FGMACT-PPPP

POLLUTION CONTROL EQUIPMENT

Fabric Filters

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	0.65 tons/day ²	Calendar Day	EUDBOOTH-4698	SC VI.1	R 336.1205(1)(a), R 336.1702(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coating	6.3 lb VOC/gal (minus water) ^a as applied ²	Daily volume-weighted average	EUDBOOTH-4698	SC VI.1	R 336.1702(c)

^a The phrase “minus water” shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any paint spray booth unless all exhaust filters are in place and operating properly.² (R 336.1301(1)(c), R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content, density, solids weight fraction, solids volume fraction of any coating, as applied or as received, shall be tested using USEPA Method 24. The five most frequently used coatings plus five random coatings shall be tested on an annual basis.² (R 336.1702(a))
2. Upon prior written approval by the AQD District Supervisor, the VOC content of coatings may be determined using manufacturers formulation data.² (R 336.1702(a))

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep the following information on a daily basis for EUDBOOTH-4698:
 - a. Gallons or pounds of each VOC containing material used.
 - b. Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c. VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
 - d. VOC emission calculations determining the daily emission rate of each in tons per calendar day.
 The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a), R 336.1702(c))

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. Quarterly reporting demonstrating compliance with applicable VOC emission and content limits shall be submitted to the District Supervisor within 30 days following the end of each calendar quarter in which the data were collected.² (R 336.1702(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-MISC-BOOTH5	NA	18 ²	40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACT-PPPP	Each new, reconstructed, and existing affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.	EUFASCIA-LINE EUDBOOTH-4698
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANER
FGRULE290	Generally, all equipment that is exempt from the requirement to obtain a Permit to Install pursuant to R 336.1290.	EURULE290
FGRULE287(c)	Generally, all equipment that is exempt from the requirement to obtain a Permit to Install pursuant to R 336.1287(c). Specifically, the quality control lab spray booth, Asset # AM3800.	EUAM3800
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment. (PTI No. 87-15)	NA

**FGMACT-PPPP
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Requirements of the Surface Coating of Plastic Parts and Products National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR, Part 63, Subpart PPPP as they apply to specific emission units.

Emission Units: EUFASCIA-LINE, EUDBOOTH-4698

POLLUTION CONTROL EQUIPMENT

RTO (when using “add-on control” option for EUFASCIA-LINE)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP from general use coating	0.16 pound per pound of coating solids used	Each 12-month rolling time period as determined at the end of the month	EUFASCIA-LINE EUDBOOTH-4698	SC V.1 SC VI.5 SC VI.8 SC VI.10	40 CFR 63.4490(b)(1)
2. Organic HAP from automotive lamp coating	0.45 pound per pound of coating solids used	Each 12-month rolling time period as determined at the end of the month	EUFASCIA-LINE EUDBOOTH-4698	SC V.1 SC VI.5 SC VI.8 SC VI.10	40 CFR 63.4490(b)(2)
3. Organic HAP from thermoplastic olefin (TPO) coating	0.26 pound per pound of coating solids used	Each 12-month rolling time period as determined at the end of the month	EUFASCIA-LINE EUDBOOTH-4698	SC V.1 SC VI.5 SC VI.8 SC VI.10	40 CFR 63.4490(b)(3)

4. When EUFASCIA-LINE and/or EUDBOOTH-4698 are using the compliant material option or the emission rate without add-on controls option shall be in compliance with the applicable emission limits in at all times. **(40 CFR 63.4500(a)(1))**
5. When EUFASCIA-LINE is using the emission rate with add-on controls option shall be in compliance with the applicable emission limits in SC I.1-3 at all times except during periods of startup, shutdown, and malfunction. **(40 CFR 63.4500(a)(2)(i))**
6. The permittee may comply separately with each emission limit, or comply with a predominant activity or facility-specific emission limit as provided in 40 CFR 63.4490(c)(1) or (2). **(40 CFR 63.4490(c))**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each thinner and/or other additive	No Organic HAP*	Compliant material option	EUFASCIA-LINE EUDBOOTH-4698	SC VI.6	40 CFR 63.4491(a) 40 CFR 63.4542(a)
2. Each cleaning material	No Organic HAP*	Compliant material option	EUFASCIA-LINE EUDBOOTH-4698	SC VI.6	40 CFR 63.4491(a) 40 CFR 63.4542(a)

* Determined according to 40 CFR 63.4541(a).

III. PROCESS/OPERATIONAL RESTRICTION(S)

- When EUFASCIA-LINE uses the emission rate with add-on controls option, the permittee shall meet the operating limits identified below. **(40 CFR 63.4492(b) and Table 1)**

Add-on Control Device	Operating Limit
RTO	The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established during performance testing. (40 CFR 63.4567(a))
Emission capture system that is <u>not</u> a permanent total enclosure (PTE) according to 40 CFR 63.4565(a).	The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device during performance testing. (40 CFR 63.4567(f))

- When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall be in compliance with the operating limits for emission capture systems and the RTO, at all times except during periods of startup, shutdown, and malfunction. **(40 CFR 63.4492, 40 CFR 63.4500(a)(2)(ii))**
- When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall be in compliance with the work practice standards addressed in SC IX.1, at all times. **(40 CFR 63.4493, 40 CFR 63.4500(a)(2)(iii))**
- The permittee shall not operate EUFASCIA-LINE when using the emission rate with add-on controls option, unless the RTO and capture system are installed, maintained, and operated in a satisfactory manner. The permittee shall meet the operating limits in SC III.1, applied to the emission capture system and RTO. **(40 CFR 63.4492(b), 40 CFR 63.4500(b))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall install a gas temperature monitor in the firebox of the RTO or the duct immediately downstream of the firebox before any substantial heat exchange occurs. Additionally, the permittee shall locate the temperature sensor in a position that provides a representative temperature, with a measurement sensitivity of 5°F or 1.0% of the temperature value, whichever is larger. **(40 CFR 63.4563(c), 40 CFR 63.4568(c)(3))**
- The permittee shall locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system of the RTO. A flow sensor with an accuracy of at least 10% of the flow shall be used. **(40 CFR 63.4563(c), 40 CFR 63.4568(g)(1))**
- The permittee shall locate pressure sensor(s) in or as close to a position that provides a representative measurement of the pressure drop across each opening being monitoring. The permittee shall use a pressure sensor with an accuracy of at least 0.5 inches of water column or 5% of the measured value, whichever is larger. **(40 CFR 63.4563(c), 40 CFR 63.4568(g)(2))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of **five years**. **(R 336.1213(3)(b)(ii), 40 CFR 63.4531)**

1. When **EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall conduct a performance test** according to the requirements in 40 CFR 63.7(e)(1) and under the following conditions, unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h): **(40 CFR 63.4564(a))**
 - a. The permittee shall conduct the performance test under representative operating conditions for the coating operation. Operations during periods of startup, shutdown, or malfunction and during periods of nonoperation do not constitute representative conditions.
 - b. The permittee shall conduct the performance test when the emission capture system and RTO are operating at a representative flow rate, and the RTO is operating at a representative inlet concentration.
2. During performance testing in SC V.1, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.4567 to establish the emission capture system and RTO operating limits for temperature, flow rate, and duct static pressure required by 40 CFR 63.4492. **(40 CFR 63.4492(b), 40 CFR 63.4560(a), 40 CFR 63.4567)**
3. The permittee shall record the process information that is necessary to document operating conditions during performance testing and explain why the conditions represent normal operation. Additionally, the permittee shall record information that is necessary to document emission capture system and RTO operating conditions during the test and explain why the conditions represent normal operation. **(40 CFR 63.4564(a))**
4. The permittee **shall perform capture efficiency and destruction efficiency testing every five years**. The permittee shall conduct each performance test of the emission capture system and RTO capture efficiency and emission destruction or removal efficiency, according to the following requirements: **(40 CFR 63.4564(b))**
 - a. If the capture system does not meet 100% capture efficiency according to 40 CFR 63.4565(a), the permittee shall use one of the following protocols for the capture system: Liquid-to-uncaptured-gas protocol using a temporary enclosure or building enclosure; gas-to-gas protocol using a temporary total enclosure or building enclosure; or Alternative capture efficiency protocol, which are further described in 40 CFR 63.4565(c)(d) and (e).
 - b. To determine the RTO destruction or removal efficiency, the permittee shall measure total gaseous organic mass emissions as carbon at the inlet and outlet of the RTO simultaneously using either USEPA Method 25 or 25A in 40 CFR Part 60, Appendix A. Additionally, the permittee shall, for each test run, determine the total gaseous organic emissions mass flow rates for the inlet and outlet of the RTO.
5. Before using the temperature sensor for the first time, after relocating or replacing the temperature sensor, a validation check shall be performed by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature. The permittee shall conduct an accuracy audit and a visual inspection of each temperature sensor on a quarterly basis. **(40 CFR 63.4563(c), 40 CFR 63.4568(c)(3)(iii-v))**
6. The permittee shall perform a validation check upon relocation or replacement of a flow sensor. Validation checks include comparison of flow sensor values with electronic signals simulations or via relative accuracy testing. The permittee shall conduct an accuracy audit every quarter and after a deviation, perform quarterly visual inspections of the flow sensor, and perform monthly leak checks of the flow sensor. **(40 CFR 63.4563(c), 40 CFR 63.4568(g)(1)(iv-vii))**
7. The permittee shall perform an initial calibration of the pressure drop sensor according to the manufacturer's requirements and conduct a validation check upon relocation or replacement of the pressure drop sensor. The permittee shall conduct accuracy audits on a quarterly basis or after every deviation. Additionally, the permittee shall perform monthly leak checks on pressure connections. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. The permittee shall perform a visual inspection of the sensor at least monthly if there is no redundant sensor. **(40 CFR 63.4563(c), 40 CFR 63.4568(g)(2)(iv-vii))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.4531)**

1. The permittee shall maintain, at a minimum, the following records:
 - a. A copy of each notification and report that is submitted to comply with 40 CFR, Part 63, Subpart PPPP, and the documentation supporting each notification report. **(40 CFR 63.4530(a))**
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. **(40 CFR 63.4530(b))**
2. The permittee shall maintain, at a minimum, the following records for each 12-month rolling time period:
 - a. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.4530(c)(1))**
 - b. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. **(40 CFR 63.4530(c)(2))**
 - c. For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. **(40 CFR 63.4530(c)(3))**
 - d. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.4530(c)(4)(i) through (v). **(40 CFR 63.4530(c)(4))**
 - e. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. **(40 CFR 63.4530(d))**
 - f. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each 12-month rolling time period. **(40 CFR 63.4530(e))**
 - g. The mass fraction of coating solids for each coating used during each 12-month rolling time period. **(40 CFR 63.4530(f))**
 - h. In 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4). **(40 CFR 63.4530(g))**
 - i. The date, time, and duration of each deviation. **(40 CFR 63.4530(h))**
 - j. For the emission rate with add-on controls option, records specified in 40 CFR 63.4530(i)(1) through (8) below. **(40 CFR 63.4530(i))**
 - i. For each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction.
 - ii. Records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - ii. The records required to show continuous compliance with each operating limit specified in 40 CFR, Part 63, Subpart PPPP, Table 1 that applies to the facility.
 - iv. For each capture system that is a PTE, the data and documentation used to support a determination that the capture system meets the criteria in 40 CFR, Part 51, Appendix M, Method 204 for a PTE and has a capture efficiency of 100%, as specified in 40 CFR 63.4565(a).
 - v. For each capture system that is not a PTE, the data and documentation used to determine capture efficiency according to the requirements specified in 40 CFR 63.4564 and 63.4565(b) through (e).
 - vi. The records for the RTO organic HAP destruction or removal efficiency determination as specified in 40 CFR 63.4566.
 - vii. Records of the data and calculations the permittee used to establish the emission capture and RTO operating limits as specified in 40 CFR 63.4567 and to document compliance with the operating limits as specified in 40 CFR, Part 63, Subpart PPPP, Table 1.
 - viii. A record of the work practice plan required by 40 CFR 63.4493 and documentation that the permittee is implementing the plan on a continuous basis.

3. The permittee shall determine whether the organic HAP emission rate is equal to or less than the emission limits in SC I.1-3 using at least one of the following three options, listed below:

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

The permittee shall include all coatings, thinners and/or other additives, and cleaning materials used when determining the emission rate. **(40 CFR 63.4491)**

COMPLIANT MATERIALS OPTION

4. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.4541 when using the emission rate compliance material option. **(40 CFR 63.4541)**

5. When using the compliant materials option, the permittee shall demonstrate compliance with the emission limits for each coating using Equation 1 of 40 CFR 63.4541 for each 12-month rolling time period. **(40 CFR 63.4542)**

6. For each thinner and/or additives and cleaning material used, the permittee shall determine that each thinner and/or additives and each cleaning material used contain no organic HAP according to 40 CFR 63.4541(a). **(40 CFR 63.4542)**

EMISSION RATE WITHOUT ADD-ON CONTROLS OPTION

7. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.4551 when using the emission rate without add-on control option. **(40 CFR 63.4551)**

8. When using the emission rate without add-on control option, the permittee shall demonstrate compliance with the emission limits for each coating used in the coating operation by calculating the organic HAP emission rate for each 12-month rolling time period according to the calculations in 40 CFR 63.4551. **(40 CFR 63.4552)**

EMISSION RATE WITH ADD-ON CONTROLS OPTION

9. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.4561 when using the emission rate with add-on control option. **(40 CFR 63.4561)**

10. When using the emission rate with add-on controls option, the permittee shall calculate the organic HAP emission limit, and show continuous compliance for each 12-month rolling time period according to the calculations in 40 CFR 63.4561. **(40 CFR 63.4563)**

11. When using the emission rate with add-on controls option, the permittee shall operate the RTO temperature, flow rate, and duct static pressure (each Continuous Parameter Monitoring System (CPMS)) according to the following requirements: **(40 CFR 63.4568)**

- a. The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. The permittee shall have a minimum of four equally spaced successive cycles of CPMS operation in 1 hour.
- b. The permittee shall determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.
- c. The permittee shall record the results of each inspection, calibration, and validation check of the CPMS.
- d. The permittee shall maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment.
- e. The permittee shall operate the CPMS and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).

- f. The permittee shall not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. The permittee shall use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.
12. When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in SC III.1 using a RTO, with the applicable methods described below: **(40 CFR 63.4563(c), 40 CFR 63.4568(c))**
 - a. Collect the combustion temperature data.
 - b. Reduce the data to 3-hour block averages; and
 - c. Maintain the 3-hour average combustion temperature at or above the temperature limit.
 13. When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in SC III.1 while using the Emission capture system that is not a PTE according to 40 CFR 63.4565(a), with the applicable methods described below: **(40 CFR 63.4563(c), 40 CFR 4568(g))**
 - a. Collect the gas volumetric flow rate for each capture device.
 - b. Collect the duct static pressure for each capture device.
 - c. Reduce the data to 3-hour block averages; and
 - d. Maintain the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limit.

VII. REPORTING

1. **Prompt reporting of deviations** pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. **Semiannual reporting of monitoring and deviations** pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. **Annual certification of compliance** pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520. 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. Each semiannual compliance report shall identify the following: **(40 CFR 63.4520, 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f), 40 CFR 63.10(d))**
 - a. The company name, responsible official, which coating operation(s) used each compliance option.
 - b. If there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating operations were in compliance.
 - c. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for the emission capture system and RTO.
 - d. If the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified in 40 CFR 63.4520(c).

COMPLIANT MATERIALS OPTION

5. **If the permittee uses emission limitations by using the compliant material option, the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a) is a deviation that must be reported as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5). (40 CFR 63.4542(b))**

EMISSION RATE WITHOUT ADD-ON CONTROLS OPTION

- 6. For the emission rate without add-on controls, if the organic HAP emission rate for any 12-month rolling time period exceeds the applicable emission limits, the permittee shall report this as a deviation as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6). **(40 CFR 63.4552(b))**

EMISSION RATE WITH ADD-ON CONTROLS OPTION

- 7. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(7):
 - a. The organic HAP emission rate for any 12-month rolling time period exceeds the applicable emission limit; **(40 CFR 63.4563(b))**
 - b. An operating parameter is out of the allowed range; **(40 CFR 63.4563(c)(1))**
 - c. If an operating parameter deviates from the operating limit specified in 40 CFR Part PPPP, Table 1, then the permittee must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless the permittee has other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the District Supervisor; and/or **(40 CFR 63.4563(c)(2))**
 - d. Deviations from work practice standards. **(40 CFR 63.4563(e))**
- 8. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. **(R 336.12001(3), 40 CFR 63.4510(a))**
- 9. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor of the test date no less than 7 days prior to the test date. **(R 336.2001(4), 40 CFR 63.4510(a))**
- 10. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5), 40 CFR 63.4510(a))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

- 1. When EUFASCIA-LINE is using the emission rate with add-on controls option, the permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by EUFASCIA-LINE. The work practice plan shall specify practices and procedures to ensure at a minimum the following elements are implemented:
 - a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers. **(40 CFR 63.4493(b)(1))**
 - b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized. **(40 CFR 63.4493(b)(2))**

- c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials and waste materials must be conveyed from one location to another in closed containers or pipes. **(40 CFR 63.4493(b)(3))**
- d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents. **(40 CFR 63.4493(b)(4))**
- e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment. **(40 CFR 63.4493(b)(5))**

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

- 2. The permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3) for EUFASCIA-LINE. This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the RTO. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures. **(40 CFR 63.4500(c))**
- 3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart P for Surface Coating of Plastic Parts and Products. **(40 CFR, Part 63, Subparts A and P)**

**FGCOLDCLEANERS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

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

Emission Units: EUCOLDCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

1. The permittee shall not use cleaning solvents containing more than 5% by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (R 336.1213(2))

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(h))
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(r)(iv))
2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 °F, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
 - c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

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

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

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

VII. REPORTING

1. Prompt **reporting of deviations** pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. **Semiannual reporting of monitoring and deviations** pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. **Annual certification of compliance** pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

FGRULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EURULE290

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**
2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**

3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: **(R 336.1290(a)(iii))**
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**
 - b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**
 - c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
 - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**
2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. (R 336.1213(3))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE287(c)
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c). This includes the quality control lab spray booth, Asset # AM3800.

Emission Unit: EUAM3800

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. REPORTING

1. **Prompt reporting of deviations** pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. **Semiannual reporting of monitoring and deviations** pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. **Annual certification of compliance** pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

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

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

Appendix 2. Schedule of Compliance

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

Progress Reports

The permittee shall submit Certified Progress Reports to the appropriate AQD District Supervisor using the MDEQ, AQD, Report Certification form (EQP 5736). Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor. **(R 336.1213(4)(b))**

Progress reports shall contain the following information:

The projected dates for achieving scheduled activities, milestones or compliance as required in the schedule of compliance. **(R 336.1213(4)(b)(i))**

The actual dates that the activities, milestones, or compliance are achieved. **(R 336.1213(4)(b)(i))**

An explanation of why any dates in the schedule of compliance were not or will not be met. **(R 336.1213(4)(b)(ii))**

A description of any preventative or corrective measures adopted in order to ensure that the schedule of compliance is met. **(R 336.1213(4)(b)(ii))**

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

The permittee shall use the current approved formats and procedures for the recordkeeping requirements referenced in EUFASCIA-LINE and EUDBOOTH-4698. Alternative formats must be approved by the AQD District Supervisor.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-A5764-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI- A5764-2009 is being reissued as Source-Wide PTI No. MI-PTI-A5764-2015

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201000007	Remove references to the Waterborne Paint Booth which is being dismantled from EURULE290. Add references to the Area D Service paint booths for a drying oven to EUDBOOTH-3655. The drying oven is being relocated from the Waterborne Paint Booth area to the Area D Service area.	EUDBOOTH-3655 EURULE290

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-A5764-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
87-15	201500088/ August 25, 2015	Incorporate Permit to Install (PTI) No. 87-15. PTI No. 87-15 is to incorporate facility-wide VOC emission limits to less than the Part 18 (PSD) threshold. The PTI also makes some physical changes to EUFASCIA-LINE.	FGFACILITY FGMISC-PLANT EUFASCIA-LINE EUNORTH-C-LINE EUDBOOTH-4698
NA	201600158/ December 5, 2016	Update the CAM Conditions to incorporate the upper and lower limits for the inlet static pressure, and update the static pressure excursion limit based on performance testing results.	EUFASCIA-LINE
NA	201800072 / August 2, 2018	Remove EUNORTH-C-LINE from the ROP, since it was dismantled and removed from the facility. FGMISC-PLANT was changed to EUDBOOTH-4698, since it was the only emission unit covered in the Flexible Group.	EUNORTH-C-LINE FGMISC-PLANT FGMACT-PPPP

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in **EUFASCIA-LINE**.

VOC emissions in pounds per calendar day (after control):

Coating usage (gallons/calendar day) X VOC content (pounds VOC/gallon of coating) X [100% - VOC control efficiency] = Controlled VOC emissions (pounds per calendar day)

VOC emissions in pounds per hour:

Coating usage (gallons/hour)* X VOC content (pounds VOC/gallon of coating) X [100% - VOC control efficiency] = Controlled VOC emissions (pounds per hour)

*From records of daily usage and hours of operation.

VOC control efficiency:

VOC Control Efficiency (%) = VOC Capture Efficiency* (%) X VOC Destruction Efficiency* (%)
* as determined by most recent stack testing

VOC emissions in tons per month:

Coatings (gallons/month) X VOC content (pounds VOC/gallon of coating) X [100% - VOC control efficiency]
/ 2000 pounds/ton = Controlled VOC emissions (tons/month)

VOC emissions in tons per year based on a 12-month rolling time period:

VOC emissions/current month (tons) + VOC emissions/previous 11 months (tons) = VOC emissions (tons/
12 month rolling time period.

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUDBOOTH-4698.

VOC emissions in tons per month:

Coatings, clean-up, and miscellaneous solvents (gallons/month) X VOC content (pounds VOC/gallon of coating, clean-up, misc. solvent) / 2000 pounds/ton = VOC emissions (tons/month)

VOC emissions in tons per year based on a 12-month rolling time period:

VOC emissions/current month (tons) + VOC emissions/previous 11 months (tons) = VOC emissions (tons/
12 month rolling time period.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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



RENEWABLE OPERATING PERMIT APPLICATION

AI-001: ADDITIONAL INFORMATION

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

SRN: A5764	Section Number (if applicable):
------------	---------------------------------

1. Additional Information ID AI -PTE HAPs

Additional Information

2. Is This Information Confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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See attached PTE summary for HAPs.

Ventra Evert - MI-ROP-A5764-2015c Renewal
POTENTIAL TO EMIT - Hazardous Air Pollutants

PTE - tpy

Source	Total HAP	Phenol	Toluene	Ethylbenzene	Formaldehyde	Cumene	Xylene	Benzene	Methanol	MIBK	Styrene	Methyl methacrylate	Ethylene Oxide	n-Hexane	1,3-Butadiene	Acetaldehyde	Acrolein	PAHs
Natural Gas Sources	2.375		0.004		0.095			0.003						2.27				
EUFASCIA-LINE																		
Coating	65.81	0.06	5.06	28.92	0.12	0.33	32.04	0.03	5.78	1.86	1.88	0.11	0.01					
Purge & Cleanup	18.88		18.88				18.88		10.52	18.88								
EUMISC-PLANT	0.170	0.00009	0.038	0.0079	0.0009	0.038	0.081											
Parts Washers	0.0																	
VacMetallizer	0.0																	
Fire Pump	0.0022		0.00023		0.00066		0.00016	0.00052							0.00002	0.00043	0.00005	0.00009
TOTAL	87.2	0.062	24.0	28.9	0.21	0.37	51.0	0.032	16.3	20.7	1.88	0.11	0.0084	2.27	0.00002	0.00043	0.00005	0.00009

Notes:

- Natural gas sources are based on AP42 Table 1.4-3
- EUFASCIA-LINE was estimated by determining the maximum coating usage rate based on the VOC Permit Limit and the 2018 actual usage and emissions data
The maximum coating usage for each coating type was then multiplied by the highest HAP containing coating for each coating type
Purge & Cleanup was done similarly using the two HAP containing solvents is use at the facility.
- EUMISC-PLANT was estimated using Rule 287(c) as a limiting factor so 200 gal/month * 12 months per year * highest HAP containing coating used.
- There are not HAP containing materials used in the parts washers or VacMetalizer.
- The fire pump is a diesel fuel fired engine. Emission factors from AP-42 Table 3.3-2 were used for estimating the PTE based on 500 hours/year fo operation.



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: A5764	Section Number (if applicable):
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1. Additional Information ID AI-Plans

Additional Information

2. Is This Information Confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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See attached CAM and SSM Plans.

Compliance Assurance Monitoring (CAM) Plan

For

Ventra Evart, LLC
601 West Seventh Street
Evart, MI 49631

This document presents the procedures that satisfy the Compliance Assurance Monitoring (CAM) rule requirements applicable to the emission control devices for the automated coating operations at Ventra Evart, LLC. This CAM plan is being submitted as a minor modification to the facility's Title V Renewable Operating Permit (ROP) renewal application.

I. Background

A. Emission Unit

The emission unit subject to this requirement is an automated coating line used to coat automotive parts, such as fascias, hereinafter referred to as EUFASCIA-LINE. The line consists of a washline, a dry off oven, cure oven, and three (3) spray booths that apply adhesion promoter, basecoat and clearcoat. Emissions from the EUFASCIA-LINE automated sections are controlled by a regenerative thermal oxidizer (RTO).

B. Applicable Regulation, Emission Limit, Monitoring Requirements

Ventra Evart, LLC (Ventra) is considered a major source for the emissions of Hazardous Air Pollutants and VOCs, and is therefore required to maintain a Title V ROP. Ventra currently has ROP MI-ROP-A5764-2015a, which expires April 27, 2020. The facility is also subject to the requirements of 40 CFR 63, Subpart PPPP-National Emission Standards for Hazardous Air Pollutants from Surface Coating of Plastic Parts and Products. Subpart PPPP contains three different options to assure compliance with HAP emission limits in 40 CFR 63.4490. The three options are:

A. *Compliant material*

B. *Emission rate without add-on controls*

C. *Emission rate with add-on controls*

The facility must choose one or more of the three options to demonstrate compliance with 40 CFR 63.4490. Due to the composition of certain materials in use at the facility, Ventra cannot utilize the Compliant Materials option. However the facility can utilize both the Emission Rate without add-on controls and the Emission Rate with add-on controls. Under the current production mix and the current paint and solvent formulations, the facility can demonstrate compliance with HAP emission limits by utilizing the Emission Rate without add-on controls (i.e. the RTO).

This CAM Plan is required for the Volatile Organic Compound (VOC) emission limits contained in the ROP for EUFASCIA-LINE, which are not covered by the NESHAP requirements. The VOC emission limits for EUFASCIA-LINE are as follows:

- i. The total VOC emission rate from EUFASCIA-LINE shall not exceed 168.3 pounds/hour.
- ii. The total VOC emission rate from EUFASCIA-LINE shall not exceed 135 tons/year, based on a 12-month rolling average.

The current ROP requires Ventra to continuously monitor and record the RTO combustion chamber temperature and static duct pressure at the RTO inlet duct.

Should the facility's production mix or paint and solvent formulation change to point that the Emission Rate without add-on controls option was no longer showing compliance with HAP emission limit at 40 CFR 63.4490, the facility would be required to use the Emission Rate with add-on controls option to prove compliance. The utilization of the RTO to prove compliance with the HAP emission limits at 40 CFR 63.4490 requires a higher 3-hour average temperature Performance Indicator than when compared to the 3-hour average temperature Performance Indicator for VOC control and a 3-hour average air flow Performance Indicator in place of the 3-hour average static duct pressure. Should the facility be required to utilize the Emission Rate with add-on controls they will then utilize the higher Performance Indicators described in section II-C & D and in section IV-C below. The HAP emission limits for EUFASCIA-LINE are as follows:

- i. 0.16 lb per lb of coating solids over a 12-month rolling time period for each existing general use coating affected source.
- ii. 0.26 lb per lb of coating solids over a 12-month rolling time period for each existing thermoplastic olefin (TPO) coating affected source.

C. Control Technology

Ventra has a Regenerative Thermal Oxidizer (RTO) that is used to control the emissions from the automated portion of the EUFASCIA-LINE. The manual booths on EUFASCIA-LINE are exhausted to atmosphere and never controlled; therefore bypass monitoring is not applicable. The robotic paint booths on EUFASCIA-LINE are always controlled by the RTO, and automatic process controls will not allow the robots to operate unless the RTO is operating. The RTO must be in "oxidize" mode before

the robots can operate, and only goes into “oxidize” mode once the minimum operating temperature is reached. The RTO has an average operating temperature between 1500° and 1775° Fahrenheit, with a minimum operating temperature of 1400° Fahrenheit. The RTO goes out of “oxidize” mode if the temperature falls below 1400°, thereby ceasing all painting operations on EUFASCIA-LINE.

All emissions from the fascia line coating processes are directed to the RTO at 94.85% capture efficiency, with a 97.90% destruction efficiency at an average inlet static pressure of the RTO during the test was .6 inches water column. The fascia line does not operate unless the RTO is operating; there are no bypass controls and no bypassed emissions; therefore, methods to detect a bypass are not required on this emission unit.

D. CAM Plan Applicability

Ventra’s fascia line is subject to the CAM rule because the RTO is a control device that is used to achieve compliance with the facility emission limitations found in the current ROP. In addition, the potential pre-controlled emissions of VOC and HAPS are more than 100% of the major threshold limit.

II. Monitoring Approach

A. Indicator (when utilizing the Emission Rate without add-on controls option)

Operation of the RTO is monitored by a Continuous Parametric Monitoring System (CPMS), in accordance with the requirements set forth in 40 CFR 52.21(j). RTO combustion chamber temperature is monitored as an indicator of proper destruction efficiency. Air flow to the RTO, as indicated by the static duct pressure, is monitored as an indicator of capture efficiency.

B. Indicator Range (when utilizing the Emission Rate without add-on controls option)

For RTO inlet static pressure, an excursion is defined as a 3-hour average static duct pressure of less than .52 in-wc.

For RTO temperature, an excursion is defined as a 3-hour average which is less than 1425° F.

C. Indicator (when utilizing the Emission Rate with add-on controls option)

Operation of the RTO is monitored by a Continuous Parametric Monitoring System (CPMS), in accordance with the requirements set forth in 40 CFR 63 Subpart PPPP. RTO combustion chamber temperature is monitored as an indicator of proper destruction efficiency. Air flow to the RTO is monitored as an indicator of proper capture efficiency.

- D. Indicator Range (when utilizing the Emission Rate with add-on controls option)
For RTO inlet static duct pressure, an excursion is defined as a 3-hour average which is less than .52 in-wc.
For RTO temperature, an excursion is defined as a 3-hour average which is less than 1452° F.

III. Performance Criteria

A. Data Representativeness

The RTO combustion chamber temperature measurement monitors the temperature of air exiting the combustion chamber.

Static duct pressure is monitored on the combined duct that transports all of air from EUFASCIA-LINE zones controlled by the RTO

B. Verification of Operational Status

The electronically recorded RTO temperature has been verified during installation by comparison with the paper chart recorder and the RTO control panel display.

The electronically recorded RTO inlet static duct pressure has been verified during installation by comparison with a hand-held instrument.

C. QA/QC Practices and Criteria

When using the “with add-on controls” option to demonstrate compliance with the requirements of 40 CFR 63, Subpart P PPP-National Emission Standards for Hazardous Air Pollutants from Surface Coating of Plastic Parts and Products., the accuracy of the RTO air flow and temperature measurement devices will be verified at least once every six months consistent with Subpart P PPP NESHAP requirements. If necessary, the devices will be recalibrated or replaced if recalibration is not feasible.

If using the “with add-on controls” option above is not necessary to demonstrate compliance, then the accuracy of the RTO static duct pressure and temperature measurement devices will be verified at least once every six months. If necessary, the devices will be recalibrated or replaced if recalibration is not feasible.

D. Monitoring Frequency

The air flow into the RTO is monitored continuously and recorded electronically by the CPMS at least every fifteen minutes, recording at least four equally spaced values over each hour. At least four equally spaced successive measurements are averaged to calculate an hourly average. A three-hour average is calculated as the mean of three successive one-hour averages.

The static duct pressure into the RTO is monitored continuously and recorded electronically by the CPMS at least every fifteen minutes, recording at least four equally spaced values over each hour. At least four equally spaced successive measurements are averaged to calculate an hourly average. A three-hour average is calculated as the mean of three successive one-hour averages.

The RTO combustion chamber temperature is monitored continuously and recorded electronically by the CPMS at least every fifteen minutes, recording at least four equally spaced values over each hour. At least four equally spaced successive measurements are averaged to calculate an hourly average. A three-hour average is calculated as the mean of three successive one-hour averages.

E. Data Collection Procedure

The data is collected from the measurement devices and stored in the CPMS system for retrieval and documentation. Measured values are retained in support of averaging calculations.

Each week of operation, maintenance personnel will replace the paper chart and verify proper operation of the chart recorder.

F. Averaging Period

Consistent with the Subpart P PPP NESHAP, the RTO air flow and temperature data are used to calculate 1-hour averages and 3-hour averages. An excursion is defined as a 3-hour average value outside the relevant indicator range.

IV. Justification

A. Rationale for Selection of Performance Indicators

Inlet static duct pressure was selected as an indicator because of the overall air balance and operation of our system in correlation with the RTO. The system was set up and air balance adjusted to show a slight positive air flow to RTO as opposed to a forced air flow or overly positive. This concept of setting air balance is to insure a slightly positive air flow to the RTO without overly pressurizing the system prior to inlet fan to RTO. When using the “with add-on controls” option to demonstrate compliance, the static duct pressure is the Performance Indicator. When using the “with add-on controls” option is not necessary to demonstrate compliance, the static duct pressure will be used to indicate the proper air flow.

In general, thermal oxidizers are designed to operate at a relatively constant temperature. Monitoring operating temperature provides a means of detecting a change in operation that could lead to an increase in emissions. A decrease in operating temperature can indicate that the destruction efficiency of VOCs may not be adequate.

Bypass monitoring is not required for EUFASCIA-LINE because each emission generating zone is either always controlled (robotic booths and cure oven) or always uncontrolled (manual booths); i.e., there are no intermittently controlled paint booths or ovens on EUFASCIA-LINE.

Specifically, the RTO will automatically go out of “oxidize” mode, causing the paint robots on EUFASCIA-LINE to immediately stop applying coatings, if any of the following occurs:

- If a fault is detected on any of the proximity switches on any of the canister (catalyst bed) inlet or outlet dampers
- If the frequency drive fan is off
- If the combustion air fan is off
- If the hydraulic pump (which powers the automatic inlet and outlet air dampers) is off
- If the oxidizer air flow switch does not detect air flow
- If the combustion air flow switch does not detect air flow
- If the natural gas pressure is either too low or too high
- If ignition is lost on any of the four pilots
- If inlet static pressure is too low or too high

B. Rationale for Selection of Indicator Ranges (when utilizing the Emission Rate without add-on controls option)

The selected indicator range for RTO static duct pressure is any 3-hour average reading of less than .52 in-wc. If the static duct pressure is outside the indicator range, the CPMS system will notify Ventra

personnel, who will verify that the data is being recorded correctly, that EUFASCIA-LINE is painting, and calculate the relevant 3-hour averages. If the 3-hour average is outside the indicator range, personnel will perform an inspection to confirm whether the Fascia line was actually painting during that period, check the flow measurement device for proper operation, and confirm that the reading was not part of a calibration test or other maintenance activity. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range for static duct pressure of less than .52 in-wc was selected because measurements below this point could indicate that one of the exhaust systems controlled by the RTO is not operational.

The selected indicator range for the RTO temperature is a 3-hour average of at least 1425°F. In accordance with the “EPA/Auto Protocol for Compliance Assurance Monitoring” (hereinafter Protocol), the “specified value” for the RTO temperature is the average temperature during the three one-hour runs for the 2012 performance test, which is 1452° F. According to the Protocol, the indicator value should be 50° F below the specified value. However utilizing the above Protocol parameter would provide an excursion temperature of 1402° F. This temperature is too close to the deviation temperature of 1400° F to provide the facility adequate time to address any system issues. Therefore, if the 3-hour average RTO temperature is less than 1425° F, the facility will define this to be the excursion level and the process will be reviewed to determine if an excursion occurred. The review will involve determining whether the fascia paint line was in operation during the period, verifying proper operation of the temperature data and/or chart recorder, comparing electronic data and chart recorder data if available, and confirming that the reading was not part of a calibration test or other maintenance activity. If there was an actual excursion, Ventra will initiate corrective action.

The RTO combustion chamber temperature is also recorded on a chart recorder having increments of no more than 20 degrees F (in compliance with QA/QC Procedures found in EPA/Auto Protocol for Compliance Assurance Monitoring, Section AA.II.B.3) as a backup recording device.

C. Rationale for Selection of Indicator Ranges (when utilizing the Emission Rate with add-on controls option)

The selected indicator range in accordance with Table 1 to Subpart P of Part 63 – Operating Limits if Using the Emission Rate with Add-On Controls Option for RTO air flow is a three-hour average static pressure of less than .52 in-wc. If the static pressure is below the indicator range, the CPMS system will notify Ventra personnel, who will verify that the data is being recorded correctly, that EUFASCIA-LINE is painting, and calculate

the relevant 3-hour averages. If the 3-hour average is outside the indicator range, personnel will perform an inspection to confirm whether the Fascia line was actually painting during that period, check the flow measurement device for proper operation, and confirm that the reading was not part of a calibration test or other maintenance activity. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range for inlet static pressure less than .52 in-wc was selected because static pressure measurements below this point could indicate that one of the exhaust systems controlled by the RTO is not operational.

The selected indicator range for the RTO temperature is a 3-hour average of at least 1425°F in accordance with Table 1 to Subpart P of Part 63 – Operating Limits if Using the Emission Rate with Add-On Controls Option. Therefore, if the 3-hour average RTO temperature is less than 1425° F, the process will be reviewed to determine if an excursion occurred. The review will involve determining whether the fascia paint line was in operation during the period, verifying proper operation of the temperature data and/or chart recorder, comparing electronic data and chart recorder data if available, and confirming that the reading was not part of a calibration test or other maintenance activity. If there was an actual excursion, Ventra will initiate corrective action.

The RTO combustion chamber temperature is also recorded on a chart recorder having increments of no more than 20 degrees F (in compliance with QA/QC Procedures found in EPA/Auto Protocol for Compliance Assurance Monitoring, Section AA.II.B.3) as a backup recording device.

D. Performance Test

On October 13 & 14, 2015, a performance test was performed on the RTO and the EUFASCIA-LINE capture system. This testing was performed under conditions of maximum emissions potential under anticipated operating conditions. The test demonstrated 94.85% capture efficiency, with a 97.90% destruction efficiency by the RTO. The average static pressure to the RTO during the test was .61 in-wc, and the average RTO temperature was 1433° F. Ventra developed the indicator ranges in this CAM Plan from the 2012 and 2015 performance tests. We would also request the upper and lower limits for the static pressure be set at a .72 in-wc to .47 in-wc. This range would be used as our upper and lower limits for deviations and as previously stated, the excursion limit would be less than .52 in-wc. No changes have taken place to the fascia line or equipment that would affect VOC capture since the performance test was conducted. The report for this performance test was submitted to the DEQ Cadillac District Office on December 8, 2015, by Ventra Evert. Additional copies of the test report will be furnished upon request.

Startup, Shutdown, Malfunction Abatement Plan

I. Purpose

1. Ensure compliance with the Malfunction Abatement Plan (MAP) requirements in the following:
 - a. Permit-To-Install # 78-07A, dated 9/13/2007, Table E-1.1 EUFASCIA-LINE Emission Unit / Process Group Requirements, V. Operational Parameters, Special Condition #4;
 - b. Renewable Operating Permit 19960046a
 - c. Michigan Air Pollution Control Rules R 336.1201 and R 336.1911
 - d. 40 CFR Part 52.21(j)
2. Ensure compliance with the following Startup, Shutdown, Malfunction Plan requirements in 40 CFR Part 63:
 - a. 40 CFR 63.6(e)(3)
 - b. 40 CFR 63.4500(c)
3. Prevent, detect, and correct malfunctions or equipment failures resulting in emissions that could exceed any applicable emission limitation.

II. Scope

This procedure applies to the Fascia Line, Regenerative Thermal Oxidizer, and associated monitoring equipment at the Ventra Evert, L.L.C. (Ventra Evert) manufacturing facility.

III. Responsibility

The EHS Manager or Designate is responsible for establishing and maintaining this procedure and troubleshooting with the Maintenance Manager and Paint Manager.

The Paint Setup, Onsite Paint Supplier Employees and Contractor Cleanup Crew Employees are responsible for minimizing fugitive air emissions generated from their routine, daily tasks.

IV. Regulatory / Permit References

Air Pollution Control Rules, Part 9, Emission Limitations and Prohibitions - Miscellaneous

Rule R 336.1911 Malfunction Abatement Plans - the MAP is required to be in writing and shall, at a minimum, specify all of the following:

1. A complete preventative maintenance program, including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
2. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
3. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

Air Permit #78-07A Special Conditions Table E-1.1

Process / Operational Limits:

1. The Permittee shall maintain a minimum overall VOC control efficiency (combined capture and destruction efficiency) of 86% across EUFASCIA-LINE. (R 336.1205, R 336.1225, R 336.1702(a), R 336.2802, R 336.2810, and 40 CFR Part 52.21, R 336.1910)
2. The Permittee shall not operate the fascia line unless all automatic booth water wash equipment is installed and operating properly. (R 336.1301(c) and R 336.1201)
3. Permittee shall not operate the fascia line unless all manual booth dry filters are installed and operating properly. (R 336.1301(c) and R 336.1201)
4. Permittee shall not operate the fascia line unless the thermal oxidizer is installed and operating properly in accordance with the Malfunction Abatement Plan (MAP) for the thermal oxidizer. (40 CFR Part 52.21(j), R 336.1702(a), R 336.1201, and R 336.1911)

***National Emission Standards for Hazardous Air Pollutants,
40 CFR 63.4500***

(c) If your affected source uses an emission capture system and add-on control device, you must develop a written startup, shutdown, and malfunction plan according to the provisions in § 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

***National Emission Standards for Hazardous Air Pollutants,
40 CFR 63.6(e)(3)***

(i) The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. The startup, shutdown, and malfunction plan does not need to address any scenario that would not cause the source to exceed an applicable emission limitation in the relevant standard. This plan must be developed by the owner or operator by the source's compliance date for that relevant standard. The purpose of the startup, shutdown, and malfunction plan is to—

(A) Ensure that, at all times, the owner or operator operates and maintains each affected source, including associated air pollution control and monitoring equipment, in a manner which satisfies the general duty to minimize emissions established by paragraph (e)(1)(i) of this section;

(B) Ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants; and

(C) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

...

(vi) To satisfy the requirements of this section to develop a startup, shutdown, and malfunction plan, the owner or operator may use the affected source's standard operating procedures (SOP) manual, or an

Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this section and are made available for inspection or submitted when requested by the Administrator.

V. Preventative Maintenance Program

The Operations and Maintenance Manual for the RTO is maintained in the Fascia Paint Maintenance Work area and is available for review upon request. Ventra Evert maintains routine maintenance parts and supplies like access door gaskets, grease and other lubricants, spark igniters and combustion chamber thermocouples.

The following RTO Preventative Maintenance activities are conducted with the following frequencies:

Daily

1. Check blower motors and fan impeller for excessive vibration due to worn bearings or an out of balance wheel.
2. Lubricate / grease fittings and bearings per manufacturer instructions
3. Visually inspect ventilation system ductwork to identify leaks

Weekly

1. Replace the RTO Temperature Circular Chart
2. Visually inspect the burner for flame pattern and color. The burner should show a continuous flame and an even pattern over the entire area of the burner(s).
3. Hydraulic power unit and hydraulic system should be visually inspected for the following:
 - a. reservoir level
 - b. fluid leaks
 - c. erratic operations
 - d. pressure
 - e. filter visual indicators

Quarterly

1. Accuracy Audit / Validation Check / Calibration on the RTO airflow and temperature monitoring equipment as required by 40 CFR Part 63.4568(c) and (g). Accuracy Audit methods can include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices.
2. Periodic cleaning and inspection of the burner is a necessity and should be performed at least quarterly or sooner as required.
3. Check Inlet duct, outlet duct, lower canisters and valves of oxidizer for build up of material. Clean as required.

4. Inspect all gauges, flow and pressure switches, controls, etc., for proper functioning.
5. Check pressure drop through entire gas piping system to verify acceptable working conditions.

Annual

1. Perform annual “burn out” of the RTO to ensure adequate airflow through the five canisters by burning any accumulated deposits.
2. Annual RTO PM - shutdown and inspection service by an outside contractor with documented and photograph report generated. The following is a summary of the areas inspected and serviced as part of the annual RTO preventative maintenance:
 - a. Internal / External Inspection
 - i. Insulation and overall interior condition
 - ii. Media Condition – looking for breakage and dusting
 - iii. Media Supports – looking for coating
 - iv. Burner Block and Associated Insulation Condition
 - v. Access Door to the Burner Chamber
 - vi. Hot Spots around burners
 - b. Canister Valves, Dampers, and Ductwork
 - i. Flange seals – look for evidence of leaks
 - ii. Ductwork Condition and external insulation condition
 - iii. Expansion Joints
 - iv. Condition of Flanges with bolts
 - v. Canister Valve conditions
 - vi. Inlet and Outlet Damper Seals
 - vii. Canister Valve Actuators and Linkages
 - viii. Proximity Switches
 - ix. Damper Travel Speeds within acceptable tolerance
 - x. Vacuum Relief Damper – ensure free movement
 - xi. Damper Bird Screen Condition
 - c. Hydraulic System
 - i. Hydraulic pump operating at a satisfactory pressure
 - ii. Hydraulic low pressure switch operation verified
 - iii. Hydraulic Accumulator is working properly
 - iv. Hydraulic Fluid Heater set point verification
 - v. Hydraulic Oil Level
 - vi. Hydraulic pressure and return filters change out
 - d. Temperature Control / Safety Systems
 - i. Thermocouples condition check and change if necessary
 - ii. Oxidizer Minimum Airflow Switch proper operation confirmed and set at 0.5” WC and tested for burner shutdown
 - iii. Combustion Minimum Airflow Switch proper operation confirmed and set at 10” WC and tested for burner shutdown

- iv. Inlet Static Pressure transmitter range confirmed at $-8.0''$ to $+2.0'' = 4$ to 20 milliamps
- v. High Temperature Limit set point at 1775 F and tested for burner shutdown
- vi. Trend IQ3 Digital Temperature Recording
- vii. Purge Timer confirmation at 12 minutes; trial for ignition is 10 seconds
- viii. Low Gas Pressure Switch setting confirmed at 3'' WC and tested for burner shutdown
- ix. High Gas Pressure Switch setting confirmed at 60'' WC and tested for burner shutdown
- x. PLC Battery changed if necessary
- xi. Each Burner UV Scanner tested for burner shutdown
- xii. Low and High fire switches on the burner actuators are properly adjusted
- e. Burner Gas Train
 - i. Confirm main gas supply is at 10 PSI
 - ii. Confirm Oxidizer gas regulator pressure is set at 18'' WC at low fire
 - iii. Condition of all burner profiles
 - iv. Condition of Gas train
 - v. Condition of Combustion Fan Filter – replace if necessary
- f. Electrical System
 - i. Proper operation of the Burner Actuators throughout their range
 - ii. Proper operation of VFD of the FD Fan
 - iii. Proper operation of all alarms and displaying on the Xycom
 - iv. Condition of all electrical terminals, panel switches, relays, and lights
 - v. Copies of the PLC Program are readily available onsite
- g. Fans
 - i. Condition of all fans (RTO Inlet, Purge Fan, Combustion Fan) and associated fan housings and belts

Spare Parts List

The current list of spare parts required for the Fascia Line capture system and the RTO is available in the Maintenance Department.

VI. Startup

Detailed Startup Procedure

The Fascia Line process control system allows painting to commence only when the RTO is in Oxidize mode, indicating that the RTO is at the proper temperature and capture system equipment is operating. Painting may continue only as long as the RTO is in Oxidize mode. All valves/dampers are automatically controlled by the RTO process control system, which will not allow the RTO to go into Oxidize mode in bypass mode. There is no means to manually “override” this interlock. Therefore, painting cannot be performed unless the RTO is operating at the proper temperature and all capture system equipment is operating.

Startup Documentation

The startup procedure described above is contained in the programming of the Fascia Line process control system. This programming is followed automatically, at all times, and cannot be altered by the robot operators. Therefore, the programmed interlocks in the Fascia Line process control system serves as documentation that this procedure is followed at all times.

VII. Shutdown

Detailed Startup Procedure

Before the RTO is shut down, the RTO goes out of Oxidize mode, causing the the Fascia Line to immediately and automatically stop painting. There is no means to manually “override” this interlock. Therefore, painting cannot be performed once the RTO goes out of Oxidize mode.

Startup Documentation

The interlock described above is contained in the programming of the Fascia Line process control system. This programming is followed automatically, at all times, and cannot be altered by the robot operators. Therefore, the programmed interlock in the Fascia Line process control system serves as documentation that this procedure is followed at all times.

VIII. Malfunctions

Malfunctions of the Emission Control System

Any abnormal condition of the Fascia Line, including the air capture system and the RTO, shall be reported to the Fascia Inside Supervisor or the Paint Manager.

If the abnormal condition poses a risk of exceeding an emission limit or causing an unsafe condition, the Fascia Inside Supervisor or the Paint Manager shall cause the Fascia line to immediately stop painting and notify the EHS Manager. Painting operations may not continue until the Paint Manager or the EHS Manager determines that the emission control system is operating normally.

If the abnormal condition does not pose a risk of exceeding an emission limit or causing an unsafe condition, the Fascia Inside Supervisor or the Paint Manager shall notify the EHS Manager. The EHS Manager shall initiate an investigation of the condition and determine if a malfunction of the emission control system occurred.

Malfunctions of the Continuous Parameter Monitoring System

Abnormal Data

If CPMS data is outside the operating limits, or otherwise appears to be unusual and potentially unreliable, the EHS Department will initiate an investigation to determine the root cause of the data. If the abnormal data appears to have been caused by a malfunction of the CPMS, the EHS Department or designated party should perform the following steps as soon as practicable until the CPMS is properly recording data:

1. Observe the data display at the CPMS control panel and compare to the recorded data.
2. For temperature abnormalities, compare the CPMS data display to other displays on the RTO control panel.
3. For air flow abnormalities, attempt to re-zero the air flow measuring instrument according to the manufacturer instructions.
4. Conduct verification of the abnormal reading using a redundant instrument, and/or by electronically simulating a redundant instrument.

5. Request manufacturer, vendor, and/or third party technical support.

Missing Data

If a gap is observed in the recorded CPMS data, the EHS Department will initiate an investigation to determine the root cause of the missing data. If the Fascia Line and/or RTO were operating during the missing data period, and the missing data was not caused by maintenance and/or calibration activities, the EHS Department shall initiate corrective action.

IX. RTO Performance Monitoring Variables

There are several performance monitoring variables for the RTO with respect to efficiency of operation, gas usage rates, airflow rates, and numerous temperature readings. For purposes of demonstrating compliance to relevant air pollution control rules, RTO Pollution Control Efficiency is determined as a combination of both destruction efficiency and capture efficiency for temperature and airflow respectively. Air flow is monitored by static pressure. As a result temperature and static pressure are deemed the relevant performance monitoring variables to ensure Control Efficiency requirements are being met. There are three (3) temperatures routinely monitored: inlet, outlet and combustion chamber versus time. Static pressure is monitored at RTO inlet fan. The normal operating range of these variables is as follows:

- A. Inlet Temperature Normal range is 100 – 140 F
- B. Outlet Temperature Normal range is 150 – 250 F
- C. Combustion Chamber Temperature Normal range is 1500 – 1600 F.
- D. Static pressure is monitored at RTO inlet fan. Current indicator range that was determined through performance testing is between 0.47 inches of water column to 0.72 inches of water column.

The current burner set point is 1500 F, 100 degrees F above the minimum compliance limit of 1400 F as specified in the Air Permit-To-Install #78-07A Special Conditions, Table E-1.1 EUFASCIA LINE Emission Unit / Process Group Requirements, I. Design Parameters, C. Other Design Parameters, #2.

The Permit condition is stated as follows: Permittee shall not operate the thermal oxidizer unless a minimum temperature of 1400 degrees Fahrenheit and a minimum retention time of 0.5 seconds in the combustion chamber of the thermal oxidizer is maintained. (40 CFR Part 52.21(j), Rule R 336.2810, R 336.1702(a), R 336.1201)

X. Associated Documents

Environmental Policy
Contractor Environmental, Health, and Safety Policy
Air Use Permit #78-07A for Fascia Line
Renewable Operating Permit No. MI-ROP-A5764-2015c
40 CFR 63.6(e)
40 CFR Part 63.4568
40 CFR Part 52.21(j)
Part 9 Air Pollution Control Rules

Fascia RTO Spare Parts List



Ventra Evert
601 W. 7th Street
Evert, MI 49631
(231) 734-9000

www.flex-n-gate.com

INTERIOR & EXTERIOR PLASTICS
BODY STRUCTURE & EXTERIOR METALS
MECHANICAL ASSEMBLIES
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Via Certified Mail
7020 1290 0000 0238 7100

September 27, 2022

Caryn Owens
Air Quality Division
EGLE
120 W. Chapin St.
Cadillac, MI 49601-2158

Subject: ROP Application C-001: Certification

RECEIVED
AQD
SEP 29 2022
MACES _____
FILE _____ MAERS _____

Dear Ms. Owens:

Please find enclosed the signed ROP Application C-001: Certification. I have emailed all other documents requested.

If you have any questions, you may contact me at (231) 734-9000, extension 49317.

Sincerely,

Nichalos Spivey

A handwritten signature in blue ink, appearing to be 'N. Spivey', written over the printed name.

Encl: ROP Application C-001 Certification



RECEIVED

AQD

RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

SEP 29 2022

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 provide this information may result in civil and/or criminal penalties. Please type or print clearly.

This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN A5764
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Stationary Source Name Ventra Evert, LLC	
City Evert	County Osceola

SUBMITTAL CERTIFICATION INFORMATION	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input checked="" type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to _____	
3. Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal. AI 101	

CONTACT INFORMATION	
Contact Name Nichalos A. Spivey	Title Environmental Manager
Phone number 231-429-4231	E-mail address nspivey@flexngate.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Steve Watts			Title General Manager	
Mailing address 601 West Seventh Street				
City Evert	State MI	ZIP Code 49631	County Osceola	Country US
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
 _____ Signature of Responsible Official			9.27.2022 _____ Date	

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

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

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.
 If Yes, identify the emission units in the table below. If No, go to Part H. Yes No
Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input checked="" type="checkbox"/> Rule 287(2)(c) surface coating line	EUADHESIVES – minor gluing activities	January 2017
<input checked="" type="checkbox"/> Rule 290 process with limited emissions	EUVACMETALLIZER – metallizing parts in a vacuum metallizer. Exhaust goes through a filter process before release back into plant air.	January 2017

Comments:

Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: **AI-101**



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: A5764	Section Number (if applicable):
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1. Additional Information ID AI-101

Additional Information

2. Is This Information Confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Updated Part G of the ROP Application

Page	of
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Malfunction Abatement Plan

I. Purpose

The purpose of this plan is to:

1. Ensure compliance with the Malfunction Abatement Plan (MAP) requirements in the following:
 - a) ROP Number MI-ROP-A5764-2015c
 - b) Michigan Air Pollution Control Rules R 336.1201 and R 336.1911
 - c) 40 CFR Part 52.21(j)
2. Ensure compliance with the NESHAP Subpart P PPP Startup, Shutdown, Malfunction Plan requirements
3. Prevent, detect, and correct malfunctions or equipment failures resulting in emissions that could exceed any applicable emission limitation.

II. Scope

This procedure applies to the Fascia Line Air Pollution Control Equipment at the Ventra Evert, L.L.C. (Ventra Evert) manufacturing facility, located in Evert, Michigan.

III. Responsibility

The **EHS Manager or Designate** is responsible for establishing and maintaining this procedure and troubleshooting with the **Maintenance Manager** and **Paint Manager**.

The **Paint Setup, Onsite Paint Supplier Employees** and **Contractor Cleanup Crew Employees** are responsible for minimizing fugitive air emissions generated from their routine, daily tasks.

Paint Manager, Maintenance Manager, and the **EHS Manager** are responsible for approving this procedure.

IV. Regulatory / Permit References

A. Air Pollution Control Rules, Part 9, Emission Limitations and Prohibitions - Miscellaneous

Rule R336.1911 Malfunction Abatement Plans - the MAP is required to be in writing and shall, at a minimum, specify all of the following:

1. A complete preventative maintenance program, including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
2. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
3. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

B. ROP Number: MI-ROP-A5764-2015c, Operational Parameters are as follows:

Process / Operational Limits

1. The Permittee shall maintain a minimum overall VOC control efficiency (combined capture and destruction efficiency) of 86% across EUFASCIA-LINE. Temperature and static pressure requirements are listed in Section VI. (R 336.1205, R 336.1225, R 336.1702(a), R 336.2802, R 336.2810, and 40 CFR Part 52.21, R 336.1910)
2. The Permittee shall not operate the fascia line unless all automatic booth water wash equipment is installed and operating properly. (R 336.1301(c) and R 336.1201)
3. Permittee shall not operate the fascia line unless all manual booth dry filters are installed and operating properly. (R 336.1301 (c) and R 336.1201)
4. Permittee shall not operate the fascia line unless the thermal oxidizer is installed and operating properly in accordance with the Malfunction Abatement Plan (MAP) for the thermal oxidizer. (40 CFR Part 52.21(j), R 336.1702(a), R 336.1201, and R 336.1911)

V. Preventative Maintenance Program

The Operations and Maintenance Manual for the RTO is maintained in the Fascia Paint Maintenance Work area and is available for review upon request. Ventra Evert maintains routine maintenance parts and supplies like access door gasketing, grease and other lubricants, spark igniters and combustion chamber thermocouples.

The following RTO Preventative Maintenance activities are conducted with the following frequencies:

A. Daily

1. Check blower motors and fan impeller for excessive vibration due to worn bearings or an out of balance wheel.
2. Lubricate / grease fittings and bearings per manufacturers instructions
3. Visually inspect ventilation system ductwork to identify leaks

B. Weekly

1. Replace the RTO Temperature Circular Chart (TO BE REPLACED WITH DIGITAL RECORDKEEPING WITH NEW "TREND IQ3 CONTROLLER FOR OPERATION AND RECORDING DATA)
2. Visually inspect the burner for flame pattern and color. The burner should show a continuous flame and an even pattern over the entire area of the burner(s).
3. Hydraulic power unit and hydraulic system should be visually inspected for the following:
 - i. reservoir level
 - ii. fluid leaks
 - iii. erratic operations
 - iv. pressure
 - v. filter visual indicators

C. Monthly and Quarterly

1. Accuracy Audit / Validation Check / Calibration on the RTO airflow/static pressure and temperature monitoring equipment. Necessary to demonstrate compliance to the NESHAP requirements for Continuous Parameter Monitoring System (CPMS) installation, operation, and maintenance. Reference 40 CFR Part 63.4568. Accuracy Audit methods can include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices.
2. Periodic cleaning and inspection of the burner is a necessity and should be performed at least quarterly or sooner if needed.
3. Check Inlet duct, outlet duct, lower canisters and valves of oxidizer for build up of material. Clean as required.
4. Inspect all gauges, flow and pressure switches, controls, etc... for proper functioning
5. Check pressure drop through entire gas piping system to verify acceptable working conditions.

D. Annual

1. Annual "burn out" of the RTO to ensure adequate airflow through the five canisters by burning any accumulated deposits.
2. Annual RTO PM - shutdown and inspection service by an Outside Contractor with documented and photograph report generated.

The following is a summary of the areas inspected and serviced as part of the annual RTO preventative maintenance:

Internal / External Inspection

- a) Insulation and overall interior condition
- b) Media Condition – looking for breakage and dusting
- c) Media Supports – looking for coating
- d) Burner Block and Associated Insulation Condition
- e) Access Door to the Burner Chamber
- f) Hot Spots around burners

Canister Valves, Dampers, and Ductwork

- a) Flange seals – look for evidence of leaks
- b) Ductwork Condition and external insulation condition
- c) Expansion Joints
- d) Condition of Flanges with bolts
- e) Canister Valve conditions
- f) Inlet and Outlet Damper Seals
- g) Canister Valve Actuators and Linkages
- h) Proximity Switches
- i) Damper Travel Speeds within acceptable tolerance
- j) Vacuum Relief Damper – ensure free movement
- k) Damper Bird Screen Condition

Hydraulic System

- a) Hydraulic pump operating at a satisfactory pressure (i.e. ~750 PSI)
- b) Hydraulic low pressure switch operation confirmed at 425 PSI out at 400 PSI
- c) Hydraulic Accumulator is working properly
- d) Hydraulic Fluid Heater set point (~82F)
- e) Hydraulic Oil Level
- f) Hydraulic pressure and return filters change out

Temperature Control / Safety Systems

- a) Thermocouples condition check and change if necessary
- b) Oxidizer Minimum Airflow Switch proper operation confirmed and set at 0.5" WC and tested for burner shutdown
- c) Combustion Minimum Airflow Switch proper operation confirmed and set at 10" WC and tested for burner shutdown
- d) Inlet Static Pressure transmitter range confirmed at -8.0" to +2.0" = 4 to 20 milliamps
- e) High Temperature Limit set point at 1775 F and tested for burner shutdown
- f) Trend IQ3 Digital Temperature Recording
- g) Purge Timer confirmation at 12 minutes; trial for ignition is 10 seconds
- h) Low Gas Pressure Switch setting confirmed at 3" WC and tested for burner shutdown
- i) High Gas Pressure Switch setting confirmed at 60" WC and tested for burner shutdown
- j) PLC Battery changed if necessary
- k) Each Burner UV Scanner tested for burner shutdown
- l) Low and High fire switches on the burner actuators are properly adjusted

Burner Gas Train

- a) Confirm main gas supply is at 10 PSI
- b) Confirm Oxidizer gas regulator pressure is set at 18" WC at low fire
- c) Condition of all burner profiles
- d) Condition of Gas train
- e) Condition of Combustion Fan Filter – replace if necessary

Electrical System

- a) Proper operation of the Burner Actuators throughout their range
- b) Proper operation of VFD of the FD Fan
- c) Proper operation of all alarms and displaying on the Xycom
- d) Condition of all electrical terminals, panel switches, relays, and lights
- e) Copies of the PLC Program are readily available onsite

Fans

- a) Condition of all fans (RTO Inlet, Purge Fan, Combustion Fan) and associated fan housings and belts

E. Recommended Spare Parts List

1. Hydraulic Power Unit
 - i. Filter
 - ii. Valve
 - iii. Pump
 - iv. 10 HP Motor
 - v. Cylinder Kits
2. Xycom Module
 - i. 120 V Replacement
 - ii. 10 – 60 VDC Replacement
3. Gas Train Assembly
 - i. Spark plug
 - ii. Jordan valve
 - iii. Mini peeper
 - iv. Thermocouple
4. Proximity sensors
5. Hydraulic hose components
6. Hydraulic cylinders
 - i. 3.25" x 8" stroke
 - ii. 1.5" x 6" stroke
7. Purge fan
 - i. 75 HP Motor
 - ii. Belts
 - iii. Bearings
8. Combustion fan
 - i. 40 HP Motor
 - ii. 2312 Aluminum fan
 - iii. Filter
9. FD Fan
 - i. 500 HP Motor
 - ii. Bearings
 - iii. 544 AF fan
 - iv. Complete housing

VI. RTO Performance Monitoring Variables

There are several performance monitoring variables for the RTO with respect to efficiency of operation, gas usage rates, airflow rates, and numerous temperature readings. For purposes of demonstrating compliance to relevant air pollution control rules, RTO Pollution Control Efficiency is determined as a combination of both destruction efficiency and capture efficiency for temperature and airflow respectively. Air flow is monitored by static pressure. As a result temperature and static pressure(are deemed the relevant performance monitoring variables to ensure Control Efficiency requirements are being met. There are three (3) temperatures routinely monitored: inlet, outlet and combustion chamber versus time. Static pressure is monitored at RTO inlet fan. The normal operating range of these variables is as follows:

- A. Inlet Temperature Normal range is 100 – 140 F
- B. Outlet Temperature Normal range is 150 – 250 F
- C. Combustion Chamber Temperature Normal range is 1400 – 1600 F.

- D. Static pressure is monitored at RTO inlet fan. Current indicator range that was determined through performance testing is between 0.47 inches of water column to 0.72 inches of water column.

The current burner set point is 1500 F, 100 degrees F above the minimum compliance limit of 1400 F as specified in the MI-ROP-A5764-2015c.

The Permit condition is stated as follows: Permittee shall not operate the thermal oxidizer unless a minimum temperature of 1400 degrees Fahrenheit and a minimum retention time of 0.5 seconds in the combustion chamber of the thermal oxidizer is maintained. (40 CFR Part 52.21(j), Rule R 336.2810, R 336.1702(a), R 336.1201)

VII. Corrective Actions in the event of equipment failure

In the event the RTO equipment fails to operate within the specified monitoring variables (i.e. combustion chamber temperature monitoring or airflow monitoring), the VOC air emission generating equipment from EU-FASCIALINE will stop production until the RTO and airflow equipment has been repaired and brought back online. This is to ensure compliance with the Air Permit Special Conditions and NESHAP CPMS requirements as specified in 40 CFR Part 63.4568.

CPMS Requirements for demonstrating NESHAP Compliance:

- A. The CPMS must complete a minimum of one cycle of operation for each successive 15 minute period, resulting in a minimum of 4 equally spaced successive cycles in 1 hour.
- B. The average of all recorded readings for each successive 3 hour period must be determined for both airflow and temperature.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, Ventra Evert shall address the event and amend the MAP within 45 days after such an event occurs.

VIII. Fugitive Air Emission Minimization Procedures

- a. Hazardous Waste Materials and Associated Hazardous Waste Containers Management

Paint Setup Staff and Contractor Cleanup Crew Employees are required to minimize, to the extent practical, the amount of solvent vapors emitted from the generation of hazardous wastes such as spent purge solvent and Solvent Laden Debris Solid hazardous waste.

- i. Solvent Laden Debris Hazardous Waste Containers – drum lids shall be closed and O-rings tight on full drums except when being filled. Bungs shall be closed. When not using the Manual Jack Press to compact waste Solvent Laden Debris in the containers, the ram of the Manual Jack Press shall be returned to the “up” position and the lid of the drum shall be placed on the top of the drum to minimize fugitive air emissions.
- ii. Spent Purge Solvent Hazardous Waste Containers – drum bungs and manually operated valves shall be closed except when being filled. The only exception to this is when it becomes necessary to prevent a hazardous condition such as excessive positive or negative air pressure buildup in the containers.
- iii. Solvent Mopping / Mop Bucket – Respirators with organic vapor cartridges shall be required to be worn when mopping areas with solvent, especially when using purge solvent containing Toluene. Toluene has a very low short term exposure limit (STEL). The solvent soaked mophead shall be stored in a manner to minimize fugitive air emissions when not in use. The solvent in the mop bucket shall be either covered with a lid or removed from the bucket and safely stored in a closed, appropriate container for future reuse.

b. Spent Blanket Filters Management

Contractor Cleanup Crew Employees are required to minimize, to the extent practical, the amount of fugitive air emissions generated from exchanging primary blanket filters from the manual spray booths.

Spent blanket filters shall be bagged upon removal from the Paint spray booths to minimize paint residue housekeeping and minimize trace paint solvent fumes that could still potentially be present.

c. Paint / Solvent Containers Vapor Management

Paint Setup Staff and **Onsite Paint Supplier Employees** are required to minimize, to the extent practical, the amount of solvent vapors generated from the mixing and storing of paints, tints, and associated cutting solvents. Where practical, lids are to be used on open containers that minimize the exposed surface area of the solvents and paints in the container to the atmosphere.

IX. Associated Documents

Environmental Policy
Contractor Environmental, Health, and Safety Policy
ROP: MI-ROP-A5764-2015c
40 CFR Part 63.4568 - NESHAP
40 CFR Part 52.21(j)
Part 9 Air Pollution Control Rules
Fascia RTO Spare Parts List



Ventra Evart
601 W. 7th Street
Evart, MI 49631
(231) 734-9000

www.flex-n-gate.com

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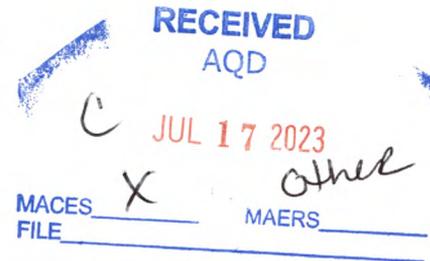
July 7, 2023

Via Certified Mail
7020 1810 0001 1427 8844

Ms. Caryn Owens
Air Quality Division
Michigan Department of Environmental Quality
120 W. Chapin Street
Cadillac, MI 49601

Subject: PTE for Ventra Evart, LLC

Dear Ms. Owens:



Please find enclosed the PTE for Ventra Evart, LLC. Along with the PTE I have included documents C-001 and AI-001.

Please feel free to contact me with any questions or if you need additional information.

Sincerely,

Nichalos Spivey
Environmental Manager
Ventra Evart, LLC
Desk: 231-734-9000 ext. 9317
Mobile: 231-429-4231

Encl: C-001 Certification Form
AI-001 Additional Information Form
PTE for Ventra Evart, LLC

**Natural Gas Combustion PTE
Ventra Evart, LLC**

Emissions (lbs/yr)

Emission Unit	Description of Combustion Activities	Usage (MMCF/yr)	CO	Lead	NOx	PM10	PM2.5	SO2
EUFASCIA-LINE	Fascia Line RTO, Cure Oven, Powerwash Dryoff Oven and Tank Heaters Natural Gas	189.435	15,912.5	0.09	26,520.9	1,439.7	1,439.7	113.7
EUMISC-PLANT	Service Booth Cure Oven Make Up Air Units, Unit Heaters	31.670	2,660.3	0.02	4,433.8	240.7	240.7	19.0
EUBOILER1	Boiler -Water tank, Unit Heaters, Roof Top Heaters	33.44	2,809.0	0.02	4,681.6	254.1	254.1	20.1

**Fire Pump PTE
Ventra Evart, LLC**

Emissions (lbs/yr)

Emission Unit	Description of Activities	Usage (gallons/yr)	CO	NOx	PM10	PM2.5	SO2	TOC
EUFIREPUMP1	Diesel motor for fire pump	320	41.60	193.28	13.60	13.60	12.70	15.78



**RENEWABLE OPERATING PERMIT APPLICATION
C-001: 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 provide this information may result in civil and/or criminal penalties. Please type or print clearly.

This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001	SRN A5764
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Stationary Source Name Ventra Evert LLC	
City Evert	County Osceola

SUBMITTAL CERTIFICATION INFORMATION	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input checked="" type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to _____	
3. Submittal Media <input type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal. AI VE PTE	

CONTACT INFORMATION	
Contact Name Nichalos Spivey	Title Environmental Manager
Phone number 231-734-9000	E-mail address nspivey@flexngate.com

This form must be signed and dated by a Responsible Official.				
Responsible Official Name Steve Watts			Title General Manager	
Mailing address 601 West Seventh St				
City Evert	State MI	ZIP Code 49631	County Osceola	Country US
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.				
 _____ Signature of Responsible Official			_____ 7.7.2023 Date	



**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.

Form Type AI-001	SRN A5764
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1. Operator's Additional Information ID AI VE PTE

Additional Information

2. Is This Information Confidential?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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3. Narrative

Following this AI-001 form is the Ventra Evar PTE. This document VE PTE as referenced on C-001 is Ventra Evar Potential to Emit.