

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

EFFECTIVE DATE: September 29, 2021

ISSUED TO

Intertape Polymer Group

State Registration Number (SRN): A6220

LOCATED AT

317 Kendall Avenue, Marysville, Saint Clair County, Michigan 48040

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-A6220-2021

Expiration Date: September 29, 2026

Administratively Complete ROP Renewal Application
Due Between March 29, 2025 and March 29, 2026

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 Rule 210(1) of the administrative rules promulgated under Act 451, 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-A6220-2021

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

Michigan Department of Environment, Great Lakes, and Energy

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 Environment, Great Lakes, and Energy (EGLE) or his or her designee.

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

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

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state 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 60604-3507. **(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(9))**

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

DESCRIPTION

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

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).

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-COMPOUNDING	Dry Stock Compounding Process - elastomers (natural or synthetic rubber) are mixed in a Banbury mixer with dry powder fillers to produce various dry stocks. Emissions are controlled by two fabric filter collectors (baghouses) – each 2800 cfm.	07-15-1994	NA
EU-WETMIXEXTRUDER	Continuous adhesive formulation process integrating the dry material compounding and mixing/blending operations. Consists of: rubber grinding station with mechanical cyclone, four (4) dry stock bulk bag loading stations controlled by a dust collector, dry stock manual loading stations, a 500-gallon toluene surge tank, various pumps and meters, an extruder equipped with a water jacket cooling system, and a final adhesive mix tote loading station.	06-17-2016	NA
EU-PROCESSVESSELS	Any stationary or portable tanks or other vessels with a capacity greater than or equal to 250 gal and in which mixing, blending, diluting, dissolving, temporary holding, and other processing steps occur in the manufacturing of a coating, as defined in 40 CFR 63.8105(g).	07-30-1980	FG-MACTHHHHH
EU-EQUIPMENTLEAKS	All affected miscellaneous coating manufacturing equipment in organic HAP service, except for equipment that is in service less than 300 hours per year, equipment in vacuum service, or equipment contacting non-process fluids.	07-30-1980	FG-MACTHHHHH

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-WETMIX&WHIP-OP	Adhesive and coating preparations - mixing and blending of ingredients prior to application, mixing for viscosity adjustment, additive blending, cleaning of preparation equipment and coating line parts, handling, storage and transfer of coatings and solvents.	07-30-1980	FG-COATINGPROCESS FG-MACT HHHHH
EU-COATINGLINE1	Web coating machine, applicators, and associated drying and curing ovens. Emissions are controlled by solvent recovery unit and thermal oxidizer.	07-30-1980	FG-COATINGPROCESS
EU-COATINGLINE3	Web coating machine, applicators, and associated drying and curing ovens. Emissions are controlled by solvent recovery unit and thermal oxidizer.	07-30-1980	FG-COATINGPROCESS
EU-COATINGLINE4	Web coating machine, applicators, and associated drying and curing ovens. Emissions are controlled by solvent recovery unit and thermal oxidizer.	07-30-1980	FG-COATINGPROCESS
EU-PILOT-LINE	Coating machine and oven used to pilot test new adhesive applications. Emissions are controlled by thermal oxidizer.	01-1-1979	FG-COATINGPROCESS
EU-SRSBOILER	700 HP (30 MMBTU/HR) boiler for Solvent Recovery System (SRS), Installed in 2019. Exempt from permit to install requirements by R336.1282(2)(b)(i).	2019	FG-BOILERMACT
EU-GENERATOR	KOHLER Model 100REZGD emergency genset installed in 2018 used to power office building equipment.	2018	FG-EMERGJJJJ
EU-STORAGETANK1	Underground storage tank (20,000 gallons capacity) containing recovered solvent from the carbon adsorption system.	01-1-1982	FG-STORAGETANKS
EU-STORAGETANK2	Underground storage tank (20,000 gallons capacity) containing recovered solvent from the carbon adsorption system.	01-1-1982	FG-STORAGETANKS
EU-RDPILOT-LINE	Includes adhesive preparation (Mixing/blending) and a small web coating machine. Used for R&D activities.	10-28-2013	FG-RULE290
EU-R&DPAINTBOOTH	R&D Paint Spray Booth	01-1-1992	FG-COATINGBOOTH

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-COLDCLEANER1	Immersion cold cleaner with covers and drains used to clean metal parts for maintenance purposes. The air/vapor interface of the cleaners is less than 10 square feet. Only non-halogenated solvents are used.	01-1-1994	FG-COLDCLEANERS
EU-COLDCLEANER2	Immersion cold cleaner with covers and drains used to clean metal parts for maintenance purposes. The air/vapor interface of the cleaners is less than 10 square feet. Only non-halogenated solvents are used.	01-1-1994	FG-COLDCLEANERS
EU-COLDCLEANER3	Immersion cold cleaner with covers and drains used to clean metal parts for maintenance purposes. The air/vapor interface of the cleaners is less than 10 square feet. Only non-halogenated solvents are used.	01-1-1994	FG-COLDCLEANERS
EU-COLDCLEANER4	Immersion cold cleaner with covers and drains used to clean metal parts for maintenance purposes. The air/vapor interface of the cleaners is less than 10 square feet. Only non-halogenated solvents are used.	01-1-1994	FG-COLDCLEANERS
EU-COLDCLEANER5	Immersion cold cleaner with covers and drains used to clean metal parts for maintenance purposes. The air/vapor interface of the cleaners is less than 10 square feet. Only non-halogenated solvents are used.	01-1-1994	FG-COLDCLEANERS

**EU-COMPOUNDING
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Dry Stock Compounding Process - Elastomers (natural or synthetic rubber) are mixed in a Banbury mixer with dry powder fillers to produce various dry stocks. Emissions are controlled by two fabric filter collectors (baghouses) – each 2800 cfm.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Two fabric Filter Baghouses (North and South)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.1 pounds per 1,000 pounds of exhaust gases, calculated on a dry gas basis ²	Hourly	EU-COMPOUNDING	SC V. 1 SC VI.1 SC VI. 2	R 336.1331(1)(a)

2. Visible emissions from EU-COMPOUNDING shall not exceed a six-minute average of 20% opacity, except as specified in Rule 301(1)(a).² **(R 336.1301)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-COMPOUNDING unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the baghouse dust collector, has been submitted within 90 days of EU-COMPOUNDING start-up, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review

and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))**

2. The permittee shall maintain the pressure drop across the fabric filter baghouse within the range identified in the permittee's Malfunction Abatement Plan (MAP) for the fabric filter baghouses. The appropriate pressure drop range shall be determined by manufacturer's recommendations, visible emission observations, or any other method approved by the AQD District Supervisor. Any modifications to the pressure drop range contained in the PMP shall be submitted to the AQD District Supervisor for approval. **(R 336.1213(2), R 336.1910)**
3. At least once per calendar year, the permittee shall conduct routine and scheduled preventative maintenance on the particulate control equipment and keep a record of these activities including dates of filter replacements. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-COMPOUNDING unless the baghouses are installed and operating properly.² **(R 336.1201(3))**
2. The permittee shall equip and maintain each fabric filter baghouse with a pressure drop indicator. The appropriate pressure drop range shall be determined by manufacturer's recommendations or any other method approved by the AQD District Supervisor. Any modifications to the pressure drop range contained in the MAP shall be submitted to the AQD District Supervisor for approval. **(R 336.1213(3))**

V. TESTING/SAMPLING

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

1. Upon request of the AQD District Supervisor, the permittee shall verify Particulate Matter (PM) emission rates from EU-COMPOUNDING by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1201(3), R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

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

1. While EU-COMPOUNDING is operating, the permittee shall record the pressure drop readings from the fabric filter baghouses at least once per calendar week. **(R 336.1213(3))**
2. The permittee shall maintain a log of all significant maintenance activities conducted and all significant repairs made to the baghouse systems. Maintenance records for the baghouses shall be consistent with the MAP. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1213(3), R 336.1911)**

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 any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

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).

**EU-PROCESSVESSELS
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Any stationary or portable tanks or other vessels with a capacity greater than or equal to 250 gal and in which mixing, blending, diluting, dissolving, temporary holding, and other processing steps occur in the manufacturing of a coating, as defined in 40 CFR 63.8105(g). Provisions of the Miscellaneous Coating Manufacturing MACT are applicable only when the coating manufacturing operations produce adhesive that is not used in affiliated operations at an affected source under the POWC MACT.

Flexible Group ID: FG-MACT HHHHH

POLLUTION CONTROL EQUIPMENT

Condenser

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP with vapor pressure \geq 0.6 kPa	\geq 75% reduction by weight	Per batch	EXISTING Stationary Process Vessel	SC V.1 SC V.2 SC V.3 SC V.4 SC VI.1	40 CFR 63.8005(a) Paragraph 10(D) Consent Order AQD No. 2020-14
2. Organic HAP with vapor pressure < 0.6 kPa	\geq 60% reduction by weight	Per batch	EXISTING Stationary Process Vessel	SC V.1 SC V.2 SC V.3 SC V.4 SC VI.1	40 CFR 63.8005(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall be in compliance with the emission limits and work practice standards at all times, except during periods of startup, shutdown and malfunction. **(40 CFR 63.8000(a))**
2. The permittee shall equip each portable and stationary process vessel with a cover or lid that must be in place at all times when the vessel contains a HAP, except when material additions and sampling are occurring. **(40 CFR 63.8005(a)(1), Paragraph 10(A) & (B) Consent Order AQD No. 2020-14)**
3. The permittee shall reduce the emissions of organic HAP for each existing stationary process vessel by venting emissions through a closed-vent system to a condenser that reduces the outlet gas temperature to < 10°C if the process vessel contains HAP with a partial pressure < 0.6 kPa, or < 2°C if the process vessel contains HAP with a partial pressure \geq 0.6 kPa and < 17.2 kPa, or < -5°C if the process vessel contains HAP with a partial pressure \geq 17.2 kPa. **(40 CFR 63.8005(a)(1), Paragraph 10(D) Consent Order AQD No. 2020-14)**

4. The permittee shall reduce the emissions of total organic HAP for each new portable and/or stationary process vessel by venting emissions through a closed-vent system to a condenser that reduces the outlet gas temperature to $< -4^{\circ}\text{C}$ if the process vessel contains HAP with a partial pressure < 0.7 kPa, or $< -20^{\circ}\text{C}$ if the process vessel contains HAP with a partial pressure ≥ 0.7 kPa and < 17.2 kPa, or $< -30^{\circ}\text{C}$ if the process vessel contains HAP with a partial pressure ≥ 17.2 kPa. **(40 CFR 63.8005(a)(1), Paragraph 10(D) Consent Order AQD No. 2020-14)**
5. For each control device on a process vessel used to comply with the emission limitations, the permittee shall comply with the requirements of 40 CFR Part 63, Subpart SS as specified in 40 CFR 63.8000(c), except as stated in 40 CFR 63.8000(d) and 40 CFR 63.8005 (b) through (g). **(40 CFR 63.8005(a)(2))**
6. The permittee shall establish operating limits under the conditions required for the initial compliance demonstration except as specified in 40 CFR 63.8005(e)(1) and (e)(2). **(40 CFR 63.8005(e))**
7. If the permittee elects to establish separate operating limits for different emission episodes, operating block averages may be determined instead of the daily averages specified in 40 CFR 63.998(b)(3). An operating block is a period of time equal to the time from the beginning to end of an emission episode or sequence of emission episodes. **(40 CFR 63.8005(f))**
8. If a flow indicator could be intermittent, the permittee must install, calibrate, and operate a flow indicator at the inlet or outlet of the control device to identify periods of no flow. Periods of no flow cannot be used in daily or block averages or in fulfilling a minimum data availability requirement. **(40 CFR 63.8005(g))**
9. As an alternative to complying with the emission limits and work practice standards for each stationary process vessel greater than or equal to 250 gallons at an existing affected source, the permittee may elect to comply with emissions averaging as specified in 40 CFR 63.8050(b) through (e). **(40 CFR 63.8050(a))**
10. As an alternative to complying with the emission limits and work practice standards for each stationary process vessel at an existing affected source, the permittee may elect to comply with a 5 weight percent HAP limit for process vessels that are used to manufacture coatings with a HAP content of less than 0.05 kg per kg product as specified in 40 CFR 63.8055(b). **(40 CFR 63.8055(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall demonstrate initial compliance with a percent reduction emission limit by conducting a performance test or design evaluation under conditions as specified in 63.7(e)(1), except that the performance test or design evaluation must be conducted under worst-case conditions. The performance test for a control device used to control emission from process vessels must be conducted according to 40 CFR 63.1257(b)(8), including the submittal of a site-specific test plan for approval prior to testing. **(40 CFR 63.8005(d)(1))**
2. To demonstrate initial compliance for condensers, the permittee shall determine uncontrolled emissions using the procedures specified in 40 CFR 63.1257(d)(2) and determine controlled emissions using the procedures specified in 40 CFR 63.1257(d)(3)(i)(B) and (iii). **(40 CFR 63.8005(d)(2))**
3. The permittee shall demonstrate that each process condenser is properly operated according to the procedures specified in 40 CFR 63.1257(d)(2)(i)(C)(4)(ii) and (d)(3)(iii)(B). As an alternative to measuring the exhaust temperature, the permittee may elect to measure the liquid temperature in the receiver. **(40 CFR 63.8005(d)(3))**
4. The permittee shall conduct a performance test or compliance demonstration equivalent to the initial compliance demonstration within 360 hours of a change in operating conditions that are not considered to be within the previously established worst-case conditions. **(40 CFR 63.8005(d)(4))**

5. Within thirty (30) days after the installation of the condensers, and no later than sixty (60) days before testing, the permittee shall submit a plan for performance testing as specified in 40 CFR Part 63, Subpart HHHHH. The plan shall meet the requirements specified in Exhibit A of Consent Order AQD No. 2020-14 to the AQD Warren District Supervisor and the AQD Technical Programs Unit Supervisor for review and approval prior to testing. **(Paragraph 11(A) Consent Order AQD No. 2020-14)**
6. Within sixty (60) days after the installation of the condensers identified in paragraph 10.C of Consent Order AQD No. 2020-14, the permittee shall conduct the performance test under conditions specified in 40 CFR Part 63.7(e)(1). **(Paragraph 11(B) Consent Order AQD No. 2020-14)**
7. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3)) (Paragraph 11(D) Consent Order AQD No. 2020-14)**
8. If the permittee is unable to install the condensers by the date identified in paragraph 10.C of Consent Order AQD No. 2020-14 or conduct the performance test by the date specified in the notification identified in paragraph 11.D, then the Company may submit a written request for extension no later than seven (7) days prior to the scheduled test date to the AQD Warren Supervisor. The written request shall include the reason for the request and a proposed new test date. **(Paragraph 11(F) Consent Order AQD No. 2020-14)**

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 records of the monthly number of batches for each process vessel, the quarterly actual emissions for each process vessel, the quarterly estimated emissions for each process vessel if it had been controlled as specified in Table 1 to 40 CFR Part 63, Subpart HHHHH, and comparison of the sums of the quarterly actual and estimated emissions as specified in 40 CFR 63.8050(d). **(40 CFR 63.8080(b), Paragraph 9(E) Consent Order AQD No. 2020-14)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Within sixty (60) days after completion of the performance testing, the Company shall submit to the AQD Warren District Supervisor a Notification of Compliance Status as specified in 40 CFR Part 63.8075(d). **(R 336.1213(3)(c), R 336.2001(5), Paragraph 11(C) of Consent Order 2020-14)**
5. Within sixty (60) days after completion of the performance testing, the Company shall submit to the AQD Warren District Supervisor and the AQD Technical Programs Unit Supervisor a test report, which includes test data and results. The test report shall include gas flow rate, percentage of Organic HAP reduction, Organic HAP (lb/hr), and outlet gas temperatures. **(Paragraph 11(E) of Consent Order 2020-14)**
6. Within seven (7) days after the installation of the condensers identified in paragraph 10.C, the Company shall submit, to the AQD Warren District Supervisor, a report detailing that all of the parameters specified in the pre-compliance report have been identified, installed, calibrated, and/or are operating in a manner to identify periods of no flow. **(Paragraph 10(E) of Consent Order 2020-14)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart HHHHH, for Miscellaneous Coating Manufacturing. **(40 CFR Part 63, Subparts A and HHHHH)**
2. Within thirty (30) days after the effective date of this Consent Order, the Company shall identify and label the whip tank, mix tank and the churn tank that are used in the coating manufacturing process subject to 40 CFR Part 63, Subpart HHHHH. **(Paragraph 9(F) of Consent Order 2020-14)**

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).

EU-EQUIPMENT LEAKS EMISSION UNIT CONDITIONS

DESCRIPTION

All affected miscellaneous coating manufacturing equipment in organic HAP service, except for equipment that is in service less than 300 hours per year, equipment in vacuum service, or equipment contacting non-process fluids.

Provisions of the Miscellaneous Coating Manufacturing MACT are applicable only when the coating manufacturing operations produce adhesive that is not used in affiliated operations at an affected source under the POWC MACT.

Flexible Group ID: FG-MACT HHHHH

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall be in compliance with the emission limits and work practice standards at all times, except during periods of startup, shutdown and malfunction. **(40 CFR 63.8000(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. For equipment that is in organic HAP service at an existing source, the permittee shall comply with the requirements in 40 CFR 63.424(a) through (d) and 40 CFR 63.428(e), (f) and (h)(4) except as specified in 40 CFR 63.8015(b). **(40 CFR 63.8015(a))**

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 perform a monthly leak inspection of all equipment in organic HAP service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Each piece of equipment shall be inspected during the loading of the process vessels. **(40 CFR 63.424 (a))**
2. The permittee shall use a log book to record leak inspections and shall sign the log book at the completion of each inspection. A section of the log shall contain a list, summary description, or diagram(s) showing the location of all equipment in organic HAP service at the facility. **(40 CFR 63.424 (b))**
3. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than five calendar days after the leak is

detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in 40 CFR 63.424(d) this section. **(40 CFR 63.424 (c))**

4. Delay of repair of leaking equipment will be allowed upon a demonstration to the Administrator that repair within 15 days is not feasible. The permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed. **(40 CFR 63.424 (d))**
5. The permittee complying shall record the following information in the log book for each leak that is detected: **(40 CFR 63.428 (e))**
 - a. The equipment type and identification number;
 - b. The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);
 - c. The date the leak was detected and the date of each attempt to repair the leak;
 - d. Repair methods applied in each attempt to repair the leak;
 - e. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
 - f. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
 - g. The date of successful repair of the leak.

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 excess emissions report to the Administrator in accordance with 40 CFR 63.10(e)(3), whether or not a CMS is installed at the facility. The following occurrences are excess emissions events under 40 CFR Part 63, Subpart R, and the following information shall be included in the excess emissions report, as applicable. For each occurrence of an equipment leak for which no repair attempt was made within five days or for which repair was not completed within 15 days after detection: **(40 CFR 63.428 (h))**
 - a. The date on which the leak was detected;
 - b. The date of each attempt to repair the leak;
 - c. The reasons for the delay of repair; and
 - d. The date of successful repair.

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).

**EU-WETMIXEXTRUDER
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Continuous adhesive formulation process integrating the dry material compounding and mixing/blending operations. Consists of: rubber grinding station with mechanical cyclone, four (4) dry stock bulk bag loading stations controlled by a dust collector, dry stock manual loading stations, a 500 gallon toluene surge tank, various pumps and meters, an extruder equipped with a water jacket cooling system, and a final adhesive mix tote loading station.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse dust collector (rubber grinding and bulk loading stations)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.01 lbs per 1,000 lbs of exhaust gas ²	Hourly	EU-WETMIXEXTRUDER	SC VI.5 SC VI.7 SC V.1	R 336.1331
2. PM10	0.315 pph ²	Hourly	EU-WETMIXEXTRUDER	SC VI.5 SC VI.7 SC V.1	40 CFR 52.21(c) & (d)
3. VOC	8.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	EU-WETMIXEXTRUDER	SC VI.2	R 336.1205(3) R 336.1225 R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Adhesive coatings produced	4,000,000 gal/yr ²	12-month rolling time period as determined at the end of each calendar month	EU-WETMIXEXTRUDER	SC VI.4	R 336.1205(3) R 336.1225 R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-WETMIXEXTRUDER unless the extruder water jacket cooling system cools the adhesive coating to a temperature of 120 °F or less.² (R 336.1205(3), R 336.1225, R 336.1702(a))
2. The permittee shall not operate EU-WETMIXEXTRUDER unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the baghouse dust collector, has been submitted within 90 days of EU-WETMIXEXTRUDER start-up, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.

- b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (R 336.1225, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-WETMIXEXTRUDER unless the baghouse dust collector is installed, maintained, and operated in a satisfactory manner.² (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
2. The permittee shall not operate EU-WETMIXEXTRUDER unless the extruder water jacket cooling system is installed, maintained, and operated in a satisfactory manner.² (R 336.1205(3), R 336.1225, R 336.1702, R 336.1910)*
3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the pressure drop across the EU-WETMIXEXTRUDER baghouse dust collector on a continuous basis.² (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the water jacket cooling system water temperature for the EU-WETMIXEXTRUDER extruder OR the temperature of the adhesive coating exiting the EU-WETMIXEXTRUDER extruder on a continuous basis.² (R 336.1205(3), R 336.1225, R 336.1702, R 336.1910)

V. TESTING/SAMPLING

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

1. Upon request of the AQD District Supervisor, the permittee shall verify PM and PM10 emission rates from EU-WETMIXEXTRUDER by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

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.² (R 336.1205(3), R 336.1225, R 336.1702(a))

2. The permittee shall calculate the VOC emission rate from EU-WETMIXEXTRUDER monthly, for the preceding 12-month rolling time period, using the adhesive formulation and production rate data in conjunction with the extruder cooling water or adhesive coating temperature data OR other method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205(3), R 336.1225, R 336.1702(a))**
3. To support the emission calculations required in SC VI.2, the permittee shall monitor and record, in a satisfactory manner, the temperature of the EU-WETMIXEXTRUDER extruder water jacket cooling system cooling water or adhesive coating exiting the extruder on a per-shift basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205(3), R 336.1225, R 336.1702(a))**
4. The permittee shall monitor and record, in a satisfactory manner, the amount of adhesive coatings produced in EU-WETMIXEXTRUDER on a monthly and 12-month rolling time period basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205(3), R 336.1225, R 336.1702(a))**
5. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the EU-WETMIXEXTRUDER baghouse dust collector on a weekly basis. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1301, R 336.1331, R 336.1910)**
6. The permittee shall maintain a record of all annual calibrations made to EU-WETMIXEXTRUDER control equipment parameter monitoring and recording devices (baghouse dust collector pressure drop and extruder water jacket cooling system cooling water temperature or adhesive coating temperature). Records for the baghouse dust collector shall be consistent with the MAP required by SC III.2. The permittee shall keep all records on file at the facility and make them available to the Department upon request.² **(R 336.1205, R 336.1225, R 336.1910, R 336.1911)**
7. The permittee shall maintain a log of all significant maintenance activities conducted and all significant repairs made to the baghouse systems. Maintenance records for the baghouses shall be consistent with the MAP. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1213(3), R 336.1911)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-WETMIXEXTRUDER.² **(R 336.1201(7)(a))**
5. If the permittee is required to conduct performance testing, the permittee must submit a copy of each performance test as conducted in 40 CFR 60.4244 within 60 days after the test has been completed. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5), 40 CFR 60.4245(d))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWETMIXEXTRUDER ^A	NA	26 ²	R 336.1225, 40 CFR 52.21(c) & (d)

^A The baghouse dust collector shall be exhausted to the ambient air through a stack meeting these parameters or shall be exhausted back into the general in-plant environment.

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).

D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-COATINGPROCESS	Three primary adhesive tape manufacturing web coating lines and one pilot web coating line. Collectively these lines comprise the affected source that is subject to the Printing and Other Web Coating (POWC) MACT standard. Affiliated operations such as wet mix and whip operations are included.	EU-WETMIX&WHIP-OP EU-PILOT-LINE EU-COATINGLINE1 EU-COATINGLINE3 EU-COATINGLINE4
FG-BOILERMACT	Requirements for a new boiler and process heater that are designed to burn gas 1 subcategory fuel with a heat input capacity of 10 MMBTU/hr or greater at major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). Units designed to burn gas 1 subcategory fuels include boilers or process heaters that burn only natural gas, refinery gas, and/or Other Gas 1 fuels. Units that burn liquid fuel for testing or maintenance purposes for less than a total of 48 hours per year, or that burn liquid fuel during periods of curtailment or supply interruptions are included in this definition. These new boilers or process heaters must comply with this subpart upon startup.	EU-SRSBOILER
FG-BOILERNSPS	Natural gas fired 30 million BTU per hour boiler. The boiler is subject to New Source Performance Standards specified in 40 CFR, Part 60, Subparts A and Dc.	EU-SRSBOILER
FG-EMERGJJJJ	FG-EMERG-JJJJ consists of emergency, stationary, spark ignition (SI) internal combustion engines (ICE) with a maximum engine power greater than 19 KW (25 HP) that commence construction on and after January 1, 2009, which are subject to 40 CFR Part 60, Subpart JJJJ-The Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. For the purposes of this Subpart, the date that construction commences is the date the engine is ordered by the owner or operator	EU-GENERATOR

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-MACT HHHHH	Each new and existing miscellaneous coating manufacturing operation as defined in 40 CFR Part 63, Subpart HHHHH, 63.7985(b) that meet the conditions specified in 40 CFR 63.7985(a)(1) through (4). Provisions of the Miscellaneous Coating Manufacturing MACT are applicable only when the coating manufacturing operations produce adhesive that is not used in affiliated operations at an affected source under the POWC MACT.	EU-WETMIX&WHIP-OP EU-PROCESSVESSELS EU-EQUIPMENTLEAKS
FG-RULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EU-RDPILOT-LINE
FG-COATINGBOOTH	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.	EU-R&DPAINTBOOTH
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EU-COLDCLEANER1 EU-COLDCLEANER2 EU-COLDCLEANER3 EU-COLDCLEANER4 EU-COLDCLEANER5

**FG-COATINGPROCESS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Three primary adhesive tape manufacturing web coating lines and one pilot web coating line. Collectively these lines comprise the affected source that is subject to the Printing and Other Web Coating (POWC) MACT standard. Affiliated operations such as wet mix and whip operations are included.

Emission Unit: EU-WETMIX&WHIP-OP, EU-PILOT-LINE, EU-COATINGLINE1, EU-COATINGLINE3, EU-COATINGLINE4

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO), Solvent Recovery System (SRS)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC ^a	4.79 pounds per gallon of coating solids applied ²	24-hour averaging period	EU-COATINGLINE1 EU-COATINGLINE3 EU-COATINGLINE4 EU-PILOT-LINE	SC VI.2, VI.29, Appendix 7	R 336.1610
2. VOC	32.87 pounds per hour ²	Hourly	EU-PILOT-LINE	SC VI.3	R 336.1201(3)
3. VOC	65.74 tons per year ²	12-month rolling time period as determined at the end of calendar month	EU-PILOT-LINE	SC VI.4	R 336.1201(3)
4a. Organic HAP	No more than 20% of the mass of coating solids applied; or	Each Month	EU-COATINGLINE1 EU-COATINGLINE3 EU-COATINGLINE4 EU-PILOT-LINE	SC V.1, Appendix 5, VI.27-VI.35, IX. 6, 8-10	40 CFR 63.3320(b)(3)
4b. Organic HAP	No more than 5% of the organic HAP applied (95% reduction); or	Each month	EU-COATINGLINE1 EU-COATINGLINE3 EU-COATINGLINE4 EU-PILOT-LINE	SC V.1, Appendix 5, VI.27 - VI.35, IX. 7 - 11	40 CFR 63.3320(b)(1)
4c. Organic HAP	No more than 4% of the mass of coating materials applied; or	Each month	EU-COATINGLINE1 EU-COATINGLINE3 EU-COATINGLINE4 EU-PILOT-LINE	SC V.1, Appendix 5, VI.27 - VI.35, IX. 7 - 10	40 CFR 63.3320(b)(2)
4d. Organic HAP ^b	Outlet organic HAP concentration no greater than 20 ppmv and capture system efficiency 100%	Instantaneous	EU-COATINGLINE1 EU-COATINGLINE3 EU-COATINGLINE4 EU-PILOT-LINE	SC V.1, Appendix 5, VI.27 - VI.35, IX. 5, 7 - 11	40 CFR 63.3320(b)(4)

^a This limit is equivalent to using a coating comprised of not more than 2.9 pounds of VOC per gallon of coating (minus water) as applied, with a VOC density of 7.36 pounds per gallon, and with a mass transfer efficiency of 100 percent.²

^b The outlet organic HAP concentration is determined on a dry basis.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. If the lower explosive limit (LEL) in the A-unit oven on EU-COATINGLINE1 exceeds 10%, the permittee shall not operate EU-COATINGLINE1 unless exhaust gases from the A-unit oven are controlled by the RTO. **(R 336.1901)**
2. The permittee shall not operate the cure zones for EU-COATINGLINE1, EU-COATINGLINE3, or EU-COATINGLINE4 unless the emissions from these emission units are controlled by the RTO. **(R 336.1213(2), R 336.1901)**
3. The permittee shall not operate FG-COATINGPROCESS unless one of the following is met: **(R 336.1213(2), R 336.1901, R 336.1910)**
 - a. A minimum temperature of 1400 °F and a minimum retention time of 0.5 seconds are maintained in the RTO.
 - b. It can be demonstrated, to the satisfaction of the AQD District Supervisor, that the RTO can meet a 95% VOC destruction.
4. The permittee shall comply with the operating limits specified below in Table 1 of 40 CFR Part 63, Subpart JJJJ at all times. The operating limits shall be established during the performance test conducted according to 40 CFR 63.3360(e)(3). The operating limits and compliance methods of Table 1 include the following: **(40 CFR 63.3321)**

Add-On Control Device:	Operating Limit:
Thermal oxidizer	a) The average combustion temperature in any three-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3360(e)(3)(i).
Emission capture system	b) Submit monitoring plan to the District Supervisor that identifies operating parameters to be monitored according to 40 CFR 63.3350(f).

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The RTO shall be installed, maintained, and operated in a satisfactory manner to obtain compliance with Part 55 and the administrative rules promulgated there under. **(R 336.1213(2), R 336.1910, R 336.1901)**
2. The permittee shall not operate the tape coating process unless the SRS is installed, maintained, and operated in a satisfactory manner.² **(R336.1201(3), R 336.1910)**

V. TESTING/SAMPLING

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

1. Within five years since the last performance tests, the permittee shall verify the VOC capture efficiencies of the capture systems for the RTO and SRS control systems, the destruction efficiency of the RTO and overall control efficiency of the control system, by testing, at owner's expense, in accordance with Department requirements. The permittee shall perform all testing, sampling, analytical and calibration procedures used for the VOC test program in accordance with 40 CFR Part 60, Appendix A, Method 25a, and other acceptable reference methods approved by the AQD. No less than 60 days prior to testing, the permittee shall submit a site-specific stack test plan to the AQD. The AQD must approve the final plan, including all test methods and procedures prior to testing. No less than seven days before performance tests are conducted, the permittee shall notify the AQD District Supervisor in writing of the time and place of the performance tests and who shall conduct them. The permittee shall submit a performance test report to the AQD within 60 days after completion of testing. **(R 336.1213(3), R 336.2001(3), R 336.2003, R 336.2004, 40 CFR 63.7, 40 CFR 63.9(e), 40 CFR 63.3400(d), 40 CFR 63.3400(f))**

2. To determine compliance with 40 CFR Part 63, Subpart JJJJ, the permittee shall determine the VOC content of any non-waterborne coating, as applied, using manufacturer's formulation data, federal Reference Test Method 24, federal Reference Test Method 311, or other EPA approved reference method. The permittee may modify Method 24, as approved by EPA during previous performance testing at the facility. Random testing of coatings used on EGCOATINGLINE1, EGCOATINGLINE3, EGCOATINGLINE4 and EGPILOT-LINE shall be conducted on a yearly basis with all coatings tested within a five-year period. If more than one value is available for the VOC content of a coating, the permittee shall use the higher value to determine compliance until new data is available as a result of a change in the coating formulation. **(R336.1213(3))**
3. During the performance test, the permittee shall monitor and set ranges for static pressures of the work stations, cure zone oven vents and dryer vents to show continued compliance of the capture efficiencies of RTO Control System and SRS Control System. **(R336.1213(3), (40 CFR 63.3350(f))**
4. The permittee shall test the purity of collected solvent (%water, % VOC solvent, % HAP Solvent) from the solvent recovery system, on a semi-annual basis. **(R336.1213(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep separate records of the daily usage rate of all materials used in EU-COATINGLINE1, EU-COATINGLINE3, and EU-COATINGLINE4. **(R 336.1213(3))**
2. For FG-COATINGPROCESS the permittee shall calculate and record the pounds of VOC per gallon of applied coating solids on each coating line, based on a 24-hour averaging period. **(R 336.1213(3), R 336.1610), (R336.2040(12)(f))**
3. For EU-PILOT-LINE, the permittee shall calculate and record the pound per hour emission rates for VOC on a monthly basis using monthly operating hours and coating usage data. **(R 336.1213(3))**
4. For EU-PILOT-LINE, the permittee shall calculate and record the ton per year emission rates for VOCs, based on a 12-month rolling time period, as determined at the end of each calendar month. **(R 336.1213(3))**
5. The permittee shall equip and maintain an alarm for EU-COATINGLINE1 and E-UCOATINGLINE4 which will sound if exhaust gases are not vented to the RTO when the LEL in the A-unit oven exceeds 10%. **(R336.1213(3), R 336.1901)**
6. The permittee shall continuously monitor the lower explosive level (LEL) in the A-unit ovens on EU-COATINGLINE1 and EU-COATINGLINE4 with instrumentation and methods approved by the AQD District Supervisor. **(R 336.1213(3), R 336.1901)**
7. The permittee shall continuously monitor combustion chamber temperature and record every 15 minutes for a three-hour block average as an indicator of proper operation (adequate destruction efficiency) of the RTO. The indicator range is a three-hour block average temperature maintained above 1444°F, or the temperature value established in the most recent stack test. **(40 CFR 64.6(c)(1)(i) and (ii))**
8. The temperature monitor shall continuously monitor the combustion chamber temperature. The averaging period is based on a three-hour block average. The permanently installed thermocouples shall be calibrated annually or according to the MAP, if more frequent. **(40 CFR 64.6(c)(1)(iii))**
9. An excursion is a three-hour block average RTO combustion temperature below 1444°F, or the temperature value established in the most recent stack test. **(40 CFR 64.6(c)(2))**
10. The permittee shall evaluate the capture efficiency of the capture system by monitoring the static pressure at the exhaust fan inlet for each hood and dryer or oven zone controlled by the RTO. This shall be monitored continuously and recorded at 15-minute intervals on a data acquisition system. The static pressure shall be kept

at a value greater than 75% of the static pressure established during the most recent capture efficiency performance test. An excursion is defined as a static pressure reading below 75% of the value determined during the most recent capture efficiency performance test. **(40 CFR 64.3(a)(2))**

11. The pressure gauge shall monitor the static pressure at the exhaust fan inlets for each hood and dryer or oven zone exhausted to the RTO. The pressure gauges shall be calibrated annually or according to the MAP, if more frequent. **(40 CFR 64.6(c)(1)(iii))**
12. An excursion is defined as a static pressure reading below 75% of the value determined during the most recent capture efficiency performance test. **(40 CFR 64.6(c)(2))**
13. The permittee shall monitor the amount of daily VOC solvent usage and solvent recovery to calculate the recovery efficiency of the SRS on a daily basis by monitoring the difference between the amount of solvent used on the coating lines directed to the SRS and the amount of solvent recovered as measured by the SRS flow meters. These daily recovery efficiency calculations shall be used as an indicator of proper operation of the SRS. The 30-day rolling SRS recovery efficiency shall be maintained above 75.2%. An excursion is defined as a 30-day rolling SRS recovery efficiency below 75.2%. **(40 CFR 64.6(c)(1)(i) and (ii)), (40 CFR 64.6(c)(2))**
14. The solvent flowmeters in the SRS shall continuously monitor the amount of hydrocarbon solvent recovered by the SRS. The solvent flowmeter shall be calibrated annually or according to the MAP, if more frequent. **(40 CFR 64.6(c)(1)(iii))**
15. For each control device in operation, the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was opened and the length of time the bypass line was opened shall be kept on file. **(40 CFR 64.3(a)(2))**
16. The permittee shall evaluate the capture efficiency of the capture system by monitoring the static pressure at the exhaust fan inlet for each hood and dryer or oven zone controlled by the SRS. This shall be monitored continuously and recorded at 15-minute intervals on a data acquisition system. The static pressure shall be kept at a value greater than 75% of the static pressure established during the most recent capture efficiency performance test. An excursion is defined as a static pressure reading below 75% of the value determined during the most recent capture efficiency performance test. **(40 CFR 64.3(a)(2))**
17. The pressure gauge shall monitor the static pressure at the exhaust fan inlets for each hood and dryer or oven zone exhausted to the SRS. The pressure gauges shall be calibrated annually or according to the MAP, if more frequent. **(40 CFR 64.6(c)(1)(iii))**
18. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
19. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). See Appendix 3 for the corrective action plan. **(40 CFR 64.7(d))**

- 20. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment as identified in the approved malfunction abatement plan. **(40 CFR 64.7(b))**
- 21. 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))**
- 22. The permittee shall implement a monitoring program for the RTO and the SRS as approved by the AQD and referenced in Appendix 3. Records shall be kept in support of the monitoring requirements and for the corrective actions. **(R 336.1213(3), R 336.1910)**
- 23. The permittee shall implement a Malfunction Abatement Plan (MAP) for the RTO and the SRS as approved by the AQD and referenced in Appendix 9. Records shall be kept in support of the activities required by the Plan and for deviations from applicable requirements for FG-COATINGPROCESS. **(R 336.1213(3), R 336.1910, R 336.1911(4))**
- 24. To show compliance with the emission limit in SC 1.1, the permittee shall keep daily records of the solvent usage on EU-COATINGLINE1, EU-COATINGLINE3, and EU-COATINGLINE4 and solvent recovery. Determine the overall solvent collection and recovery efficiency (R_r) for each day using a 30-day rolling period. The recovery efficiency for each day shall be computed as the ratio of the total recovered solvent for that day and the prior 29 consecutive operating days to the total solvent usage for the same 30 day period weighted average (coating line and daily usage). The ratio shall be computed within 72 operating hours of each 24-hour operation period. **(R 336.1213(3), R 336.1610, R 336.2040(10)(a)(i))**
- 25. The permittee may determine the overall solvent collection and recovery efficiency (R_r) using the total solvent usage (M_t) for EU-COATINGLINE1, EU-COATINGLINE3, and EU-COATINGLINE4 that are controlled by the same solvent recovery system and the total solvent recovered (M_r) as follows:

 $R_r (\%) = (M_r/M_t)*100$
 See Appendix 7 for additional calculation procedures. **(R 336.1610, R336.2040(10)(a)(i))**
- 26. For add-on control devices used to comply with 40 CFR Part 63, Subpart JJJJ, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 of 40 CFR Part 63, Subpart JJJJ as follows: **(40 CFR 63.3321)**

Add-On Control Device	Compliance Demonstration
Thermal oxidizer	i) Collect the combustion temperature data according to 40 CFR 63.3350(e)(9); ii) Reduce the data to three-hour block averages; and iii) Maintain the three-hour average combustion temperature at or above the temperature limit.
Emission capture system	i) Conduct monitoring according to the plan. (40 CFR 63.3350(f)(3))

Note: If the permittee operates a catalytic oxidizer to comply with 40 CFR Part 63, Subpart JJJJ, the permittee shall demonstrate compliance with the catalytic oxidizer operating limits specified in Table 1 of 40 CFR Part 63, Subpart JJJJ.

- 27. The permittee shall monitor and inspect each capture system and each control device used to comply with the emission limit (in SC 1.4a, 1.4b, 1.4c, or 1.4d). The permittee shall install and operate the monitoring equipment as specified in 40 CFR 63.3350(c) and (f), including the following: **(40 CFR 63.3350(b))**
 - a. For web coating lines with intermittently-controlled work stations, the permittee shall monitor bypasses of the control device and the mass of each coating material applied at the work station during any such bypass. If using a control device for complying with the requirements of 40 CFR 63, Subpart JJJJ, the permittee must demonstrate that any coating material applied on a never-controlled work station, or an intermittently-controlled work station operated in bypass mode is allowed in the compliance demonstration according to 40 CFR 63.3370(n) and (o). The bypass monitoring must be conducted using at least one of the procedures in 40 CFR 63.3350(c)(1) through (4) for each work station and associated dryer, including the following: **(40 CFR 63.3350(c))**
 - i. Valve Closure Continuous Monitoring: Ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position when the emission source is in operation and is

- using a control device for compliance with the requirements of 40 CFR 63, Subpart JJJJ. The monitoring system must be inspected at least once every month to verify that the monitor will indicate valve position. **(40 CFR 63.3350(c)(3))**
- b. The permittee shall develop a site-specific monitoring plan containing the information specified in 40 CFR 63.3350(f)(1) and (2) if using a capture system and control device for one or more web coating lines. The permittee shall make the monitoring plan available for inspection by the permitting authority upon request. The requirements of 40 CFR 63.3350(f) include the following: **(40 CFR 63.3350(f))**
- i. The monitoring plan shall identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures. **(40 CFR 63.3350(f)(1))**
- ii. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission limits (in SC I.4a, I.4b, I.4c, or I.4d). The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained. **(40 CFR 63.3350(f)(2))**
- iii. The permittee shall conduct all capture system monitoring in accordance with the monitoring plan. **(40 CFR 63.3350(f)(3))**
- iv. Any deviation from the operating parameter value or range of values which are monitored according to the plan shall be considered a deviation from the operating limit. **(40 CFR 63.3350(f)(4))**
- v. The permittee shall review and update the capture system monitoring plan at least annually. **(40 CFR 63.3350(f)(5))**
28. If a solvent recovery unit is used to comply with the emission limits (in SC I.4a, I.4b, I.4c, or I.4d), the permittee shall meet the requirements in either 40 CFR 63.3350(d)(1) or (2) as follows:
- a. If compliance with the emission limit is demonstrated through liquid-liquid material balance, the permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device must be certified by the manufacturer to be accurate to within ± 2.0 percent by mass. **(40 CFR 63.3350(d)(2))**
- b. Alternatively, the permittee may demonstrate compliance with the emission limits using a Continuous Emission Monitoring System (CEMS) according to 40 CFR 63.3350(d)(1)(i) through (iii). **(40 CFR 63.3350(d)(1))**
29. If a control device is used to comply with the emission limits (in SC I.4a, I.4b, I.4c, or I.4d), the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) specified in 40 CFR 63.3350(e)(9) and (10) and 40 CFR 63.3350(f) according to the requirements in 40 CFR 63.3350(e)(1) through (8). The permittee shall install, operate, and maintain each CPMS specified in 40 CFR 63.3350(c) according to 40 CFR 63.3350(e)(5) through (7). The requirements of 40 CFR 63.3350(e) include the following: **(40 CFR 63.3350(e))**
- a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period and must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data. **(40 CFR 63.3350(e)(1))**
- b. The permittee shall have valid data from at least 90 percent of the hours during which the process operated. **(40 CFR 63.3350(e)(2))**
- c. The permittee shall determine the hourly average of all recorded readings unless all recorded readings clearly demonstrate continuous compliance with the standard. To calculate a valid hourly value, the permittee must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control. **(40 CFR 63.3350(e)(3))**
- d. The permittee shall determine the rolling three-hour average of all recorded readings for each operating period. To calculate the average for each three-hour averaging period, the permittee must have at least two of three hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods). **(40 CFR 63.3350(e)(4))**
- e. The permittee shall record the results of each inspection, calibration, and validation check of the CPMS. **(40 CFR 63.3350(e)(5))**
- f. At all times, the permittee shall maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 63.3350(e)(6))**

- g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), the permittee shall conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified 40 CFR 63.3370. The permittee shall use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 63.3350(e)(7))**
 - h. Any averaging period for which there is no valid monitoring data, and such data are required constitutes a deviation, and the permittee shall notify the AQD District Supervisor in accordance with 40 CFR 63.3400(c). **(40 CFR 63.3350(e)(8))**
 - i. If the permittee uses an oxidizer to comply with the emission standards, the permittee shall comply with the following: **(40 CFR 63.3350(e)(9))**
 - i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every three months, or the chart recorder, data logger, or temperature indicator must be replaced. The permittee shall replace the equipment if the calibration is not performed, or the equipment cannot be calibrated properly. **(40 CFR 63.3350(e)(9)(i))**
 - ii. For the RTO, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or $\pm 1^\circ$ Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone. **(40 CFR 63.3350(e)(9)(ii))**
 - j. If the permittee uses a control device other than an oxidizer or wishes to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the AQD for approval of an alternative monitoring method under 40 CFR 63.8(f). **(40 CFR 63.3350(e)(10))**
30. The permittee shall maintain the following records for the FG-COATINGPROCESS: **(40 CFR 63.6(e)(3)(iii), 40 CFR 63.6(e)(3)(iv), 40 CFR 63.10(b)(2))**
- a. The occurrence and duration of each startup, shutdown, or malfunction of FG-COATINGPROCESS;
 - b. The occurrence and duration of each malfunction of the required air pollution control and monitoring equipment;
 - c. All required maintenance performed on the air pollution control and monitoring equipment;
 - d. Actions taken during periods of startup, shutdown, and malfunction when such actions are different from the procedures specified in the Startup, Shutdown, and Malfunction Plan (SSMP); and
 - e. All information necessary to demonstrate conformance with the SSMP.
31. The permittee shall keep records of CMS measurements, audits, calibrations, and malfunctions. **(40 CFR 63.10(b)(2), 40 CFR 63.10(c))**
32. The permittee shall keep records of all reports, notifications, and of each applicability determination. **(40 CFR 63.10(b))**
33. The permittee shall maintain the records specified in 40 CFR 63.3410(a)(1) and (2) on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1), as follows:
- a. Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with 40 CFR Part 63, Subpart JJJJ, including:
 - i. If the permittee uses a CEMS to demonstrate SRS efficiency, continuous emission monitor data in accordance with 40 CFR 63.3350(d); **(40 CFR 63.3410(a)(1)(i))**
 - ii. Control device and capture system operating parameter data in accordance with 40 CFR 63.3350(c), (e), and (f); **(40 CFR 63.3410(a)(1)(ii))**
 - iii. Organic HAP content data (Method 311, Method 24, or formulation data) for the purpose of demonstrating compliance in accordance with 40 CFR 63.3360(c); **(40 CFR 63.3410(a)(1)(iii))**
 - iv. Volatile matter and coating solids content data (Method 24 or formulation data) for the purpose of demonstrating compliance in accordance with 40 CFR 63.3360(d); **(40 CFR 63.3410(a)(1)(iv))**

- v. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with 40 CFR 63.3360(e) and (f); **(40 CFR 63.3410(a)(1)(v))**
 - vi. Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with 40 CFR 63.3370(b), (c), and (d). **(40 CFR 63.3410(a)(1)(vi))**
- b. Records specified in 40 CFR 63.10(c) for each CMS operated by the permittee in accordance with the requirements of 40 CFR 63.3350(b). **(40 CFR 63.3410(a)(2))**
34. The permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.3370. The permittee must maintain the records in accordance with 40 CFR 63.10(b). **(40 CFR 63.3410(b))**
35. The permittee shall install a computerized maintenance monitoring system (CMMS) which will hold the routine (daily/weekly/monthly/yearly) maintenance and monitoring items "INCOMPLETE" until such items are completed. **(R336.1213(3))**
36. The permittee shall prepare a "Manual Checklist" of all monitoring and preventive maintenance items, as described in this ROP, for the process and control equipment. The maintenance manager or other responsible personnel shall sign off on the completion of these monitoring and maintenance items at the end of each calendar month. **(R336.1213(3))**
37. The permittee shall prepare an inventory of the following items:
- a. Amount of VOC solvents purchased annually (isopropanol, Toluene and other VOC solvents)
 - b. Amount of VOC solvents in stock including underground storage tanks, totes, etc. at the end of the year
 - c. Amount of adhesive in-house, at the end of the year.
 - d. Amount of toluene based adhesive, Isopropanol based adhesive, and water based adhesive manufactured in the year. **(R336.1213(3))**
38. The permittee shall keep records of pounds of VOC per gallon of coating, minus water, as applied. **(R336.1213(3))**
39. The permittee shall keep records the hours of operation of each coating line and identifications of coating lines operated on each day. **(R336.1213(3))**
40. The permittee shall keep monthly records of the calibrations or replacements of the device that indicates the cumulative amount of volatile matter recovered by the solvent recovery system. **(R336.1213(3))**
41. The permittee shall maintain and operate the data monitoring and collection system for control and capture system, in a satisfactory manner. **(R336.1213(3))**
42. Within 60 days of the issuance of this ROP, permittee shall prepare a preventive maintenance plan for the maintenance of the data monitoring and collection system for control and capture system, to assure satisfactory of operation of the monitoring system. **(R336.1213(3))**

See Appendices 3, 7, and 9

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 meet all applicable notification and reporting requirements specified in 40 CFR 63.3400 and 40 CFR part 63, subpart A. **(40 CFR Part 63, Subpart JJJJ)**
5. The permittee shall submit startup, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if a control device is used to comply with 40 CFR Part 63, Subpart JJJJ.
 - a. If actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the SSMP required by 40 CFR 63.6(e)(3), the permittee must state such information in the report. If actions inconsistent with the SSMP are taken and the permittee exceeds any emission limitation in SC 1.4a, 1.4b, 1.4c or 1.4d, then the permittee shall record the actions taken for that event and must report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within seven working days after the end of the event, in accordance with 40 CFR 63.10(d)(5) (unless the owner or operator makes alternative reporting arrangements, in advance, with the AQD District Supervisor). The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the AQD District Supervisor. **(40 CFR 63.6(e)(3)(iv), 40 CFR 63.10(d)(5), 40 CFR 63.3400(g)(1))**
 - b. Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in 40 CFR 63.3400(c)(2)(vi). **(40 CFR 63.3400(g)(2))**
6. The permittee shall submit semiannual compliance reports according to 40 CFR 63.3400(c), including the following:
 - a. Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. **(40 CFR 63.3400(c)(1)(iii))**
 - b. The permittee may submit the semi-annual compliance reports according to the established dates for semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) as specified in Condition 2 of this section. **(40 CFR 63.3400(c)(1)(v))**
 - c. The compliance report shall contain the information in 40 CFR 63.3400(c)(2)(i) through (vi). **(40 CFR 63.3400(c)(2))**
7. 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))**
8. 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))**
9. The permittee shall submit a Notification of Performance Tests as specified in 40 CFR 63.7 and 63.9(e) if a control device is used to comply with the emission standard and a performance test of the control device is required. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, you may consider the parameter approved. **(40 CFR 63.3400(d))**
10. The permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). **(40 CFR 63.3400(e))**
11. The permittee shall submit performance test reports as specified in 40 CFR 63.10(d)(2) if a control device is used to comply with the emission standard and the performance test requirement is not waived or is not exempted from this requirement by 40 CFR 63.3360(b). The performance test reports must be submitted as part of the notification of compliance status required in 40 CFR 63.3400(e). **(40 CFR 63.3400(f))**
12. The permittee shall submit any performance test reports, including RATA reports, to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of 40 CFR 63, Subpart A- General Provisions and Subpart JJJJ-National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating. **(40 CFR 63, Subparts A and JJJJ)**
2. The permittee shall maintain a written Startup, Shutdown, Malfunction plan for the source, control system, and monitoring system. **(40 CFR 63.6(e)(3)(v))**
3. The permittee shall develop and implement a written Continuous Monitoring System quality control program. **(40 CFR 63.8(d))**
4. If a capture system and control device are used to demonstrate compliance with SC I.4b, the permittee shall demonstrate that an overall organic HAP control efficiency of at least 95% is achieved for each month. **(40 CFR 63.3370(e))**
5. If a capture system and an oxidizer are used to demonstrate compliance with SC I.4d, the permittee shall demonstrate that an outlet organic HAP concentration of no greater than 20 ppmv by compound on a dry basis and a capture efficiency of 100% is achieved. **(40 CFR 63.3370(e))**
6. If a capture system and control device are used to comply with SC I.4a, the permittee shall limit the organic HAP emission rate to no more than 0.20 kg organic HAP emitted per kg coating solids applied as determined on a monthly average as-applied basis and shall demonstrate compliance in accordance with the provisions of 40 CFR 63.3370(f). **(40 CFR 63.3370(f))**
7. If a capture system and control device are used to comply with SC I.4c, the permittee shall limit the organic HAP emission rate to no more than 0.04 kg organic HAP emitted per kg coating material applied as determined on a monthly average as-applied basis and shall demonstrate compliance in accordance with the provisions of 40 CFR 63.3370(g). **(40 CFR 63.3370(g))**
8. If a capture system and control device are used to limit the monthly organic HAP emissions to less than the allowable emissions as calculated in accordance with 40 CFR 63.3370(l), the permittee shall demonstrate compliance in accordance with the provisions of 40 CFR 63.3370(h). **(40 CFR 63.3370(h))**
9. The permittee shall demonstrate initial compliance for each capture system and each control device through performance tests and demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters as specified in 40 CFR 63.3370(j)(1) through (3). Compliance is determined in accordance with 40 CFR 63.3370(j)(4).
 - a. Determine the control device destruction or removal efficiency using the applicable test methods and procedures in 40 CFR 63.3360(e). **(40 CFR 63.3370(j)(1))**
 - b. Determine the emission capture efficiency in accordance with 40 CFR 63.3360(f). **(40 CFR 63.3370(j)(2))**
 - c. Continuously monitor the operating parameters established according to 40 CFR 63.3350(e) and (f), whenever a web coating line is operated. **(40 CFR 63.3370(j)(3))**
 - d. Convert the information obtained under 40 CFR 63.3370(p)(1) into the units of the selected compliance option using the calculation procedures specified in 40 CFR 63.3370(k)(2)(i) through (iv). **(40 CFR 63.3370(k)(2))**
10. If more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controlled work stations are operated, the permittee shall calculate organic HAP emissions according to the procedures in 40 CFR 63.3370(o)(1) through (4) and use the calculation procedures specified in 40 CFR 63.3370(o)(5) to convert the monitoring and other data into units of the selected control option in 40 CFR 63.3370(e) through (h). Use the procedures specified in 40 CFR 63.3370(o)(6) to demonstrate compliance.

- a. If a solvent recovery system uses a liquid-liquid material balance to demonstrate compliance, the permittee shall determine the organic HAP emissions for those web coating lines controlled by that solvent recovery system by one of the following methods: **(40 CFR 63.3370(o)(1))**
 - i. If the web coating lines controlled by that solvent recovery system have only always-controlled work stations, demonstrate compliance in accordance with 40 CFR 63.3370(i)(1)(i) through (iii) and (v) through (vii), **(40 CFR 63.3370(o)(1)(i))**
 - ii. If the web coating lines controlled by that solvent recovery system have one or more never-controlled or intermittently-controlled work stations, demonstrate compliance in accordance with 40 CFR 63.3370(i)(1)(ii), (iii), (v), and (vi) and (p), or **(40 CFR 63.3370(o)(1)(ii))**
 - iii. If the permittee uses a combination of control devices that includes simultaneously using a solvent recovery system with a liquid-liquid material balance and an oxidizer with a performance test to determine capture and control efficiencies on an intermittently-controlled coating line, demonstrate compliance in accordance with 40 CFR 63.3370(i)(1)(ii), (iii), (v), and (vi) and (p) except that Equation 1 of Appendix 10 may be used in place of the equation in 40 CFR 63.3370(p)(3). **(40 CFR 63.3370(o)(1)(ii)), (40 CFR 63.3370(p)(3))**
- b. If solvent recovery system uses a performance test and CEMS to demonstrate compliance, the permittee shall perform an initial test of capture efficiency, continuously monitor the capture system operating parameter, and operate a CEMS on each solvent recovery system as follows: **(40 CFR 63.3370(o)(2))**
 - i. For each capture system delivering emissions to that solvent recovery system, monitor the operating parameter established in accordance with 40 CFR 63.3350(f) to ensure capture system efficiency; and **(40 CFR 63.3370(o)(2)(i))**
 - ii. Determine the organic HAP emissions for those web coating lines served by each capture system delivering emissions to that solvent recovery system either in accordance with 40 CFR 63.3370(i)(2)(i) through (iii), (v), (vi), and (viii), if the web coating lines served by that capture and control system have only always-controlled work stations, or in accordance with 40 CFR 63.3370(i)(2)(i) through (iii), (vi), and (p), if the web coating lines served by that capture and control system have one or more never-controlled or intermittently-controlled work stations. **(40 CFR 63.3370(o)(2)(ii))**
- c. If an oxidizer uses performance tests of capture efficiency and control device efficiency, the permittee shall continuously monitor the capture system, and operate a CPMS for control device operating parameters for each oxidizer as follows: **(40 CFR 63.3370(o)(3))**
 - i. Monitor the operating parameter in accordance with 40 CFR 63.3350(e) to ensure control device efficiency; and **(40 CFR 63.3370(o)(3)(i))**
 - ii. For each capture system delivering emissions to that oxidizer, monitor the operating parameter established in accordance with 40 CFR 63.3350(f) to ensure capture efficiency; and **(40 CFR 63.3370(o)(3)(ii))**
 - iii. Determine the organic HAP emissions for those web coating lines served by each capture system delivering emissions to that oxidizer by one of the following methods: **(40 CFR 63.3370(o)(3)(iii))**
 - A. If the web coating lines served by that capture and control system have only always-controlled work stations, demonstrate compliance in accordance with 40 CFR 63.3370(k)(1)(i) through (vi), **(40 CFR 63.3370(o)(3)(iii)(A))**
 - B. If the web coating lines served by that capture and control system have one or more never-controlled or intermittently-controlled work stations, demonstrate compliance in accordance with 40 CFR 63.3370(k)(1)(i) through (iii), (v), and (p), or **(40 CFR 63.3370(o)(3)(iii)(B))**
 - C. If the permittee uses a combination of control devices that includes simultaneously using a solvent recovery system with a liquid-liquid material balance and an oxidizer with a performance test to determine capture and control efficiencies on an intermittently-controlled coating line, demonstrate compliance in accordance with 40 CFR 63.3370(k)(1)(i) through (iii), (v), and (p) except that Equation 1 of Appendix 10 may be used in place of the equation in 40 CFR 63.3370(p)(4). **(40 CFR 63.3370(o)(iii)(B)), (40 CFR 63.3370(p)(3))**

- d. If the permittee owns or operates one or more uncontrolled web coating lines, the permittee shall determine the organic HAP applied on those web coating lines using Equation 6 of 40 CFR 63.3370. The organic HAP emitted from an uncontrolled web coating line is equal to the organic HAP applied on that web coating line. **(40 CFR 63.3370(o)(4))**
 - e. The permittee shall convert the information obtained under 40 CFR 63.3370(o)(1) through (4) into the units of the selected compliance option using the calculation procedures specified in 40 CFR 63.3370(o)(5)(i) through (iv). **(40 CFR 63.3370(o)(5))**
11. If the permittee operates more than one capture system or more than one control device and only have always-controlled work stations, then the permittee is in compliance with the emission limit in SC I.4b for the month if for each web coating line or group of web coating lines controlled by a common control device: **(40 CFR 63.3370(q))**
- a. The volatile matter collection and recovery efficiency as determined by 40 CFR 63.3370(i)(1)(i), (iii), (v), and (vi) is at least 95 percent; or **(40 CFR 63.3370(q)(1))**
 - b. The overall organic HAP control efficiency as determined by 40 CFR 63.3370(i)(2)(i) through (iv) for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent; or **(40 CFR 63.3370(q)(2))**
 - c. The overall organic HAP control efficiency as determined by 40 CFR 63.3370(k)(1)(i) through (iii) and (k)(2)(i) for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent. **(40 CFR 63.3370(q)(3))**
12. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**
13. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and 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).

FG-BOILERMACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for new boiler and process heater that are designed to burn gas 1 subcategory fuel with a heat input capacity of 10 MMBTU/hr or greater at major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). Units designed to burn gas 1 subcategory fuels include boilers or process heaters that burn only natural gas, refinery gas, and/or Other Gas 1 fuels. Units that burn liquid fuel for testing or maintenance purposes for less than a total of 48 hours per year, or that burn liquid fuel during periods of curtailment or supply interruptions are included in this definition.

Emission Units: EU-SRSBOILER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall conduct an annual tune up of each boiler or process heater as specified below. The annual tune-up shall be no more than 13 months after the previous tune-up. **(40 CFR 63.7500(a)(1), 40 CFR 63.7515(d), Table 3 of 40 CFR Part 63, Subpart DDDDD)**
 - a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary. The permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown. Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. **(40 CFR 63.7540(a)(10)(iii))**
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**

2. If the unit is not operated on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7540(a)(13))**
3. The permittee shall conduct a tune-up of each emission unit that has an oxygen trim system installed in FG-BOILERMACT of the burner(s) and combustion controls, as applicable, every five years as specified in 40 CFR 63.7540(a)(10)(i) through (vi). **(40 CFR 63.7500(d), 40 CFR 63.7540(a)(12), Table 3 of 40 CFR Part 63, Subpart DDDDD)**
 - a. Each five-year tune-up must be conducted no more than 61 months after the previous tune-up. **(40 CFR 63.7515(d))**
 - b. The permittee may delay the burner inspection until the next scheduled or unscheduled unit shutdown, but each burner must be inspected at least once every 72 months. **(40 CFR 63.7540(a)(12))**
 - c. If the unit is not operating on the required date for the tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7540(a)(13))**
4. At all times, the permittee must operate and maintain each existing gas 1 boiler or process heater, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or annual compliance report that the permittee submitted. **(40 CFR 63.7555(a)(1))**
2. If the permittee uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under 40 CFR Part 63, Other Gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR Part 60 or Part 61, or Part 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. **(40 CFR 63.7555(h))**
3. The permittee shall maintain on-site and submit, if requested by the AQD, an annual tune-up report containing the information listed below.
 - a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
 - b. A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
 - c. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**

4. The permittee's records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). **(40 CFR 63.7560(a))**
5. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for five-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.7560(b))**
6. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least two-years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining three-years. **(40 CFR 63.7560(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. If the permittee intends to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of 40 CFR Part 63, Part 60, Part 61, or Part 65, or Other Gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575. The notification must include the information as listed below.
 - a. Company name and address. **(40 CFR 63.7545(f)(1))**
 - b. Identification of the affected unit. **(40 CFR 63.7545(f)(2))**
 - c. Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared, or the natural gas supply interruption began. **(40 CFR 63.7545(f)(3))**
 - d. Type of alternative fuel that the permittee intends to use. **(40 CFR 63.7545(f)(4))**
 - e. Dates when the alternative fuel use is expected to begin and end. **(40 CFR 63.7545(f)(5))**
5. The permittee must submit boiler and process heater tune-up compliance reports to the appropriate AQD District Office. The reports must be postmarked or submitted by March 15th and must cover the period of January 1 through December 31 of the reporting year. For new units, the first report should cover the period of startup to December 31 of the reporting year. Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). **(40 CFR 63.7550(b))**
6. The permittee must submit a compliance report containing the following information:
 - a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
 - b. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**
 - c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
 - d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**

- e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**
7. The permittee must submit all reports required by Table 9 of this subpart electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, submit the report to the EPA Region V at the appropriate address listed in 40 CFR 63.13 and to the appropriate AQD District Office. **(40 CFR 63.7550(h)(3))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters as specified in 40 CFR Part 63, Subparts A and DDDDD. **(40 CFR Part 63, Subparts A and 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).

**FG-BOILERS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Natural gas fired 30 million BTU per hour boiler. The boiler provides process steam to the solvent recovery system. The solvent recovery system boiler is subject to New Source Performance Standards specified in 40 CFR, Part 60, Subparts A and Dc.

Emission Unit: EU-SRSBOILER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii)), (40 CFR 63.7560(b))**

1. The permittee shall keep a record, in a format acceptable to AQD, of natural gas usage in standard cubic feet per calendar day, calendar month and year, based upon 12-month rolling time period, as determined at the end of each calendar month. Pursuant to USEPA's prior determinations, the daily fuel usage recordkeeping requirements do not apply if and only if all the following three conditions are met at all times:
 - a. The permittee shall use only pipeline quality sweet natural gas.
 - b. The permittee shall, on a calendar monthly basis, monitor natural gas usage, separately by each boiler using a meter dedicated to each boiler.
 - c. If the permittee intends to opt out of the daily fuel usage recordkeeping requirements, the responsible official shall first advise, in writing, the AQD District Supervisor that the permittee has decided to opt out of the daily fuel usage recordkeeping requirements. **(40 CFR 60.48c(g))**
2. The permittee shall comply with reporting and recordkeeping requirements of 40 CFR, Part 60, Subpart Dc. **(40 CFR 60.48c)**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the New Source Performance Standards specified in 40 CFR, Part 60, Subparts A and Dc, as they apply to FG-BOILERSNSPS. (40 CFR 60 Subparts A and Dc)

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).

**FG-EMERGJJJJ
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

FG-EMERG-JJJJ consists of emergency, stationary, spark ignition (SI) internal combustion engines (ICE) with a maximum engine power greater than 19 KW (25 HP) that commence construction on and after January 1, 2009, which are subject to 40 CFR Part 60, Subpart JJJJ-The Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. For the purposes of this Subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

Emission Unit: EU-GENERATOR

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO _x	2.0 g/HP-hr or 160 ppmvd @ 15% O ₂	Hourly	EU-GENERATOR	SC V.1 SC V.2 SC VI.1 SC VI.2	40 CFR Part 60, Subpart JJJJ, 60.4233(e) and Table 1
2. CO for each engine HP>=130	4.0 g/HP-hr or 540 ppmvd @ 15% O ₂	Hourly	EU-GENERATOR	SC V.1 SC V.2 SC VI.1 SC VI.2	40 CFR Part 60, Subpart JJJJ, 60.4233(e) and Table 1
3. VOC ^a	1.0 g/HP-hr or 86 ppmvd @ 15% O ₂	Hourly	EU-GENERATOR	SC V.1 SC V.2 SC VI.1 SC VI.2	40 CFR Part 60, Subpart JJJJ, 60.4233(e) and Table 1

^a For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline natural gas in EU-GENERATOR. **(40 CFR 60.4233(e))NA**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain EU-GENERATOR such that it achieves the emission standards as required in 40 CFR 60.4233 over the entire life of the engine. **(40 CFR 60.4234)**
2. EU-GENERATOR shall be certified by the manufacturer to the emission standards in 40 CFR 60.4233 (SC I.1 through I.3) applicable to that engine and the permittee shall meet one of the requirements in SC III.1.a, or III.1.b: **(40 CFR 60.4234(a), (40 CFR 60.4234)(b)(1))**
 - a. If the permittee operates and maintains EU-GENERATOR according to the manufacturer's emission-related written instructions, the permittee shall keep records of conducted maintenance to demonstrate compliance, only adjust engine settings according to and consistent with the manufacturer's emission-related written instructions, and meet the requirements specified in 40 CFR 1068, Subparts A through D, as they apply. **(40 CFR 60.4234(a)(1), (40 CFR 60.4234)(b)(1))**

- b. If the permittee does not operate and maintain EU-GENERATOR according to the manufacturer's emission-related written instructions, the permittee shall: **(40 CFR 60.4234(a)(2), (40 CFR 60.4234)(b)(1))**
 - i. Keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4234(a)(2)(i) and (ii))**
 - ii. Conduct an initial performance test, specified in SC V.1, within one year of the engine no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within one year after changing emission-related settings in a way that is not permitted by the manufacturer. **(40 CFR 60.4243(a)(2)(ii))**
3. The permittee shall not operate EU-GENERATOR for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. **(R 336.2803, R 336.2804, R336.1213(3))**
4. The permittee shall operate EU-GENERATOR in compliance with the requirements in 40 CFR 60.4234(d)(1) through (d)(3) (SC III.4) in order for EU-GENERATOR to be considered emergency stationary engine: **(40 CFR 63.4243(d))**
 - a. There is no time limit on the use of emergency stationary ICE in emergency situations. **(40 CFR 63.4243(d)(1))**
 - b. The permittee may operate EU-GENERATOR for a maximum of 100 hours per calendar year for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of EU-GENERATOR beyond 100 hours per year. **(40 CFR 63.4243(d)(2))**
 - c. The permittee may operate EU-GENERATOR up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing in 40 CFR 63.4243(d)(2)(i) (SC III.4.b). The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year as permitted in this section, is prohibited. **(40 CFR 60.4243(d)(3))**
5. If the permittee does not operate EU-GENERATOR according to the requirements in paragraphs 40 CFR 60.4243(d)(1) through (3) (SC III.4) EU-GENERATOR will not be considered an emergency engine under 40 CFR 60 Subpart JJJJ and must meet all requirements for non-emergency engines. **(40 CFR 63.4233(e))**
6. The permittee may operate EU-GENERATOR using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of 60.4233. **(40 CFR 60.4233(e))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter upon startup of EU-GENERATOR. **(40 CFR 60.4237)**

V. TESTING/SAMPLING

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

1. If the permittee is required to conduct performance testing because EU-GENERATOR is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the performance tests shall be conducted according to 40 CFR 60.4244. **(40 CFR 60.4244)**

2. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

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 records of the following for EU-GENERATOR: **(40 CFR 60.4245(a))**
 - a. All notifications submitted to comply with 40 CFR 60, Subpart JJJJ and all documentation supporting any notification.
 - b. Records of the manufacturer's emission-related written instructions for EU-GENERATOR
 - c. Records
 - d. All maintenance performed on EU-GENERATOR demonstrating the engine has been maintained according to the manufacturer's emission-related written instructions specified in SC III.2.a. .
 - e. Documentation from the manufacturer that EU-GENERATOR is certified to meet the emissions standards in 40 CFR Part 60.4233 and the information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
2. If the permittee does not install, configure, operate, and maintain EU-GENERATOR according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, , the permittee shall keep records of the maintenance plan, as required by (40 CFR 60.4243(a)(2) (SC III.2.b.i), maintenance activities conducted, and documentation of performance testing required in 40 CFR 60.4243(a) (SC III.4.b.ii). **(40 CFR 60.4245(a)(4))**
3. The permittee shall keep records of the hours of operation of EU-GENERATOR that is recorded through EU-GENERATOR's non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. **(40 CFR 60.4245(b))**
4. The permittee shall monitor and record the hours of operation of the emergency generators based on a 12-month rolling time period as determined at the end of each calendar month. **(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))**
4. If the permittee is required to conduct performance testing, the permittee must submit a copy of each performance test as conducted in 40 CFR 60.4244 within 60 days after the test has been completed. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(40 CFR 60.4245(d), R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of 40 CFR Part 60, Subparts A and JJJJ, as they apply to EU-GENERATOR. **(40 CFR Part 60, Subparts A and JJJJ]**
2. A new or emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part. **(40 CFR 63.6590(c))**

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).

FG-MACT HHHHH FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each new and existing miscellaneous coating manufacturing operation as defined in 40 CFR Part 63, Subpart HHHHH, 63.7985(b) that meet the conditions specified in 40 CFR 63.7985(a)(1) through (4). This includes the facility-wide collection of equipment described in 40 CFR 63.7985(b)(1) through (4) used to manufacture coatings as defined in 40 CFR 63.8105 and also includes cleaning operations.

Provisions of the Miscellaneous Coating Manufacturing MACT are applicable only when the coating manufacturing operations produce adhesive that is not used in affiliated operations at an affected source under the POWC MACT.

Emission Unit: EU-WETMIX&WHIP-OP, EU-PROCESSVESSELS, EU-EQUIPMENTLEAKS

POLLUTION CONTROL EQUIPMENT

Condenser

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall comply with the applicable emission limits and work practice standards specified in Tables 1 through 5 of 40 CFR Part 63, Subpart HHHHH at all times, except during periods of startup, shutdown, and malfunction (SSM). **(40 CFR 63.8000(a))**
2. The permittee may open a safety device, as defined in 40 CFR 63.8105 at any time conditions requires it to avoid unsafe conditions. **(40 CFR 63.8000(b)(2))**
3. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart SS for closed vent systems and control devices that are used to comply with an emission limit in Table 1, 2, or 5 of 40 CFR Part 63, Subpart HHHHH, except as stated in 40 CFR 63.8000(d)(1) through (7). The permittee must meet the requirements of 40 CFR 63.982(c) and the requirements therein if organic HAP emissions are reduced by venting emissions through a closed-vent system to any combination of control devices (except a flare). **(40 CFR 63.8000(c)(1))**
4. For a control device with total inlet HAP emissions less than 1 ton per year, the permittee shall establish operating limit(s) for parameter(s) that will be measured and recorded at least once per averaging period (daily or block) to verify that the control device is operating properly. The permittee may measure the same parameter(s) required for control devices that control inlet HAP emission equal to or greater than 1 ton per year. If the parameter will not be measured continuously, the permittee must request approval of the proposed procedure in the pre-compliance report. The operating limits and measurement frequency must be identified, and rationale provided to support how these measurements demonstrate the control device is operating properly. **(40 CFR 63.8000(d)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The requirements specified in 40 CFR 63.8000(d)(1) apply instead of or in addition to the requirements for performance testing of control devices as specified in 40 CFR Part 63, Subpart SS. **(40 CFR 63.8000(d))**
2. The permittee may elect to conduct a design evaluation as specified in 40 CFR 63.1257(a)(1) to determine the percent reduction of a small control device, instead of a performance test as specified in 40 CFR Part 63, Subpart SS. The values and basis for the operating limits must be established as part of the design evaluation. **(40 CFR 63.8000(d)(2))**
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep all records required by 40 CFR 63.8080. These records include, but are not limited to, the following: **(40 CFR 63.8080, Paragraph 9(E) of Consent Order 2020-14)**
 - a. A record of each time a safety device is opened to avoid unsafe conditions in accordance with 40 CFR 63.8000(b)(2). **(40 CFR 63.8080(c), Paragraph 9(E) of Consent Order 2020-14)**
 - b. Records of the results of each CPMS calibration check and the maintenance performed, as specified in 40 CFR 63.8000(d)(5). **(40 CFR 63.8080(d), Paragraph 9(E) of Consent Order 2020-14)**
 - c. For each CEMS, records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period. **(40 CFR 63.8080(e), Paragraph 9(E) of Consent Order 2020-14)**
 - d. In the SSMP required by 40 CFR 63.6(e)(3), including Group 2 or non-affected emission points is not required. For equipment leaks only, the SSMP requirement is limited to control devices and is optional for other equipment. **(40 CFR 63.8080(f), Paragraph 9(E) of Consent Order 2020-14)**
 - e. If separate operating limits are established as allowed in 40 CFR 63.8005(e), retain a log of operation or a daily schedule indicating the time when changing from one operating limit to another. **(40 CFR 63.8080(g), Paragraph 9(E) of Consent Order 2020-14)**
2. The permittee may elect to comply with the monitoring and recordkeeping requirements of 40 CFR Part 63, Subpart HHHHH or the monitoring and recordkeeping requirements of another applicable subpart as specified in 40 CFR 63.8090(a) and (b). **(40 CFR 63.8090)**
3. If a continuous emission monitoring system (CEMS) is used, it must be installed, operated and maintained according to the requirements in 40 CFR 63.8 and 40 CFR 63.8000(d)(4)(i) through (iv). **(40 CFR 63.8000(d)(4))**
4. If a continuous parameter monitoring system (CPMS) is used, the permittee shall comply with the requirements in 40 CFR Part 63, Subpart SS and the provisions in 40 CFR 63.8000(d)(5)(i) through (iii). **(40 CFR 63.8000(d)(5))**
5. The exclusion of monitoring data from daily averages collected during periods of SSM as specified in 40 CFR 63.998(b)(2)(iii) and (b)(6)(i)(A) does not apply. **(40 CFR 63.8000(d)(6))**
6. For a closed vent system constructed of hard piping, the permittee shall comply with the requirements specified in 40 CFR 63.983 (b)(i)(A) and (B).
 - a. Conduct an initial inspection according to the procedures in 40 CFR 63.983 (c). **(40 CFR 63.983 (b)(i)(A))**
 - b. Conduct annual inspections for visible, audible, or olfactory indications of leaks. **(40 CFR 63.983 (b)(i)(B))**
7. If there are visible, audible, or olfactory indications of leaks at the time of the annual visual inspections required by 40 CFR 63.983 (b)(i)(B), then the permittee shall follow one of the following procedures:
 - a. The permittee shall eliminate the leak. **(40 CFR 63.983 (d)(1)(i))**

- b. The permittee shall monitor the equipment according to the procedures in 40 CFR 63.983(c). **(40 CFR 63.983(d)(1)(ii))**
8. Leaks, as indicated by an instrument reading greater than 500 parts per million by volume above background or by visual inspections, shall be repaired by the permittee as soon as practical, except as provided in 40 CFR 63.983(d)(3).
 - a. A first attempt at repair shall be made no later than five days after the leak is detected. **(40 CFR 63.983(d)(2)(i))**
 - b. Except as provided in 40 CFR 63.983(d)(3), repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. **(40 CFR 63.983(d)(2)(ii))**
9. For each instrumental or visual inspection conducted in accordance with 40 CFR 63.983(b)(1) for closed vent systems during which no leaks are detected, the permittee shall record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. **(40 CFR 63.998(d)(1)(iv))**
10. If a leak is detected in the closed vent system, the permittee shall record the information specified below and in 40 CFR 63.998(d)(1)(iii)(A) through (F).
 - a. The instrument and equipment identification number and the operator's name, initials, or identification number. **(40 CFR 63.998(d)(1)(iii)(A))**
 - b. The date the leak was detected and the date of the first attempt to repair the leak. **(40 CFR 63.998(d)(1)(iii)(B))**
 - c. The date of successful repair of the leak. **(40 CFR 63.998(d)(1)(iii)(C))**
 - d. The maximum instrument reading measured by the procedures in §63.983(c) after the leak is successfully repaired or determined to be nonreparable. **(40 CFR 63.998(d)(1)(iii)(D))**
 - e. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 days after discovery of the leak. The owner or operator may develop a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure. **(40 CFR 63.998(d)(1)(iii)(E))**
 - f. Copies of the Periodic Reports as specified in 40 CFR 63.999(c), if records are not maintained on a computerized database capable of generating summary reports from the records. **(40 CFR 63.998(d)(1)(iii)(F))**

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 to the AQD District Supervisor a predominate use determination for the underground storage tanks within 30 days of the effective date of Consent Order AQD No. 2020-14. **(Paragraph 9(A) Consent Order AQD No. 2020-14)**
5. The permittee shall submit all reports required by 40 CFR 63.8075. These reports include, but are not limited to, the following:
 - a. A pre-compliance report submitted 6 months prior to the compliance date, to request approval of any of the information in 40 CFR 63.8075(c)(1) through (4). The report will be either approved or disapproved by the AQD within 90 days after receipt. If this report is disapproved, compliance with the emission limitations and work practice standards in 40 CFR Part 63, Subpart HHHHH by the compliance date is still required. **(40 CFR 63.8075(c)) (Paragraph 9(B) Consent Order AQD No. 2020-14)**

- b. A notification of compliance status report submitted no later than 150 days after the applicable compliance date specified in 40 CFR 63.7995, and including the information specified in 40 CFR 63.8075(d)(2). **(40 CFR 63.8075(d))**
 - c. A compliance report submitted semiannually in accordance with 40 CFR 63.8075(b) which contains the information specified in 40 CFR 63.8075(e)(1) through (8). **(40 CFR 63.8075(e)) (Paragraph 9(D) Consent Order AQD No. 2020-14)**
 - d. A compliance report to the AQD Warren District Supervisor, as specified in 40 CFR 63.8075(e), no later than April 29, 2021. **(40 CFR 63.8075(e)) (Paragraph 9(C) Consent Order AQD No. 2020-14)**
6. The permittee may elect to comply with the reporting requirements of 40 CFR Part 63, Subpart HHHHH or the reporting requirements of another applicable subpart as specified in 40 CFR 63.8090(a) and (b). **(40 CFR 63.8090(a) and (b))**
 7. If a performance test is required, a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1). For any performance test required as part of the initial compliance procedures for process vessels in Table 1 of 40 CFR Part 63, Subpart HHHHH, the test plan required by 40 CFR 63.7(c) and the emission profile must also be submitted with the notification of the performance test. **(40 CFR 63.8070(c))**
 8. The permittee shall submit any performance test reports (including RATA reports) to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart HHHHH for Miscellaneous Coating Manufacturing by the initial compliance date. **(40 CFR Part 63, Subparts A and HHHHH)**
2. The permittee shall comply with the applicable General Provisions in 40 CFR 63.1 through 40 CFR 63.15 as specified in Table 10 of 40 CFR Part 63, Subpart HHHHH. **(40 CFR 63.8095)**

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).

FG-RULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016: EU-RDPILOT-LINE

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(2)(a)(i))**
2. Any emission unit for which CO₂ equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(2)(a)(ii))**
 - a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(A))**
 - b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(B))**
 - c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(2)(a)(ii)(C))**
 - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(D))**
 - e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(E))**
3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: **(R 336.1290(2)(a)(iii))**
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**
 - b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**

- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**
2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:
 - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: **(R 336.1290(2)(b)(i), R 336.1910)**
 - i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
 - ii. Wet scrubbers equipped with a liquid flow rate monitor.
 - iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
 - b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. **(R 336.1290(2)(b)(ii), R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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 maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**
 - e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**
 - f. Records are maintained on file for the most recent two-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

**FG-COATINGBOOTHS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016: EU-R&DPAINTBOOTH

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Underlying Applicable Requirement
Coatings	200 Gallons/month (minus water as applied)	Calendar month	Each emission unit	R 336.1287(2)(c)(i)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- Any exhaust system installed on or after December 20, 2016, that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer’s specifications, or the permittee develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. All emission units installed before December 20, 2016, with an exhaust system that serves only coating spray equipment must have a properly installed and operated particulate control system. (R 336.1213(2), R 336.1287(2)(c)(ii), R 336.1910)

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 maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 287(2)(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. **(R 336.1213(3))**
 - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(2)(c)(iii))**
 - b. Documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FG-COLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EU-COLDCLEANER1, EU-COLDCLEANER2, EU-COLDCLEANER3, EU-COLDCLEANER4, EU-COLDCLEANER5

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

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

V. TESTING/SAMPLING

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

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
		Hg	Mercury
		hr	Hour
EU	Emission Unit	HP	Horsepower
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallons of Applied Coating Solids	kW	Kilowatt
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	m	Meter
HVLP	High Volume Low Pressure*	mg	Milligram
ID	Identification	mm	Millimeter
IRSL	Initial Risk Screening Level	MM	Million
ITSL	Initial Threshold Screening Level	MW	Megawatts
LAER	Lowest Achievable Emission Rate	NMOC	Non-methane Organic Compounds
MACT	Maximum Achievable Control Technology	NO _x	Oxides of Nitrogen
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	Particulate Matter equal to or less than 10 microns in diameter
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pounds per hour
NSPS	New Source Performance Standards	ppm	Parts per million
NSR	New Source Review	ppmv	Parts per million by volume
PS	Performance Specification	ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration	%	Percent
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
		µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

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

Appendix 2. Schedule of Compliance

The permittee certified in this ROP application that this stationary source is in compliance with all applicable requirements except for the following: 40 CFR Part 63, Subpart HHHHH. As a result, the permittee was required to submit a Schedule of Compliance as defined in Rule 119(a), pursuant to Rule 210(2) and Rule 213(4).

A Schedule of Compliance for any applicable requirements that the permittee is not in compliance with at the time of the ROP issuance is supplemental to, and shall not sanction non-compliance with, the underlying applicable requirements on which it is based.

The permittee has adhered to this schedule of compliance and submitted the required certified progress reports accordingly.

Compliance Plan

The permittee outlined the details of achieving compliance in a narrative compliance plan. The details of the compliance plan are outlined below.

Starting in 2015, Intertape Polymer Group (IPG) began shipping a portion of the adhesives manufactured at the IPG Marysville facility to other IPG facilities for use or repackaging. The adhesives (those being shipped off site) are the same or similar to those used in the IPG Marysville coating lines, are prepared using existing equipment, and required no modifications to the existing adhesive mixing operations. It has come to IPG's attention that the IPG Marysville adhesive mixing operations are subject to the National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing (MCM MACT) promulgated in 40 CFR Part 63 Subpart HHHHH whenever HAP-containing adhesives are prepared that are not used in affiliated operations at the same location. Rather than discontinuing the MCM MACT subject processes, IPG has decided to design and install MCM MACT compliant emission controls on affected process equipment.

Schedule of Compliance

The following schedule of compliance conforms with the provisions of Rule 119(a) and Rule 213(4).

Emission Unit/ Flexible Group ID and Condition No.	Applicable Requirement	Remedial Measure	Required Action	Milestone Date	Progress Reports
Mixer #6 of EUWETMIX&WHIP-OP	40CFR 63.8005 and Subpart HHHHH Table 1	NA	Install closed vent system and control device to reduce HAP emissions by >75% for coatings/adhesives > 0.6 kPa and >60% for coatings/adhesives <0.6 kPa	10-5-2020 initial compliance demonstration	12-4-2020 final report
Churn #6 of EUWETMIX&WHIP-OP	40CFR 63.8005 and Subpart HHHHH Table 1	NA	Install closed vent system and control device to reduce HAP emissions by >75% for coatings/adhesives > 0.6 kPa and >60% for coatings/adhesives <0.6 kPa	10-5-2020 initial compliance demonstration	12-4-2020 final report

Progress Reports

The permittee shall submit Certified Progress Reports to the appropriate AQD District Supervisor using EGLE, 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

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

I. MONITORING PROGRAM DESCRIPTION –CARBON ADSORPTION SOLVENT RECOVERY SYSTEM (SRS) ON EU-COATINGLINE1, EU-COATINGLINE3, AND EU-COATINGLINE4.

Monitored Parameter: SRS overall collection and recovery efficiency (R_r), based on a 30 day rolling period.

Monitoring Devices: Solvent recovery meter (flow meter): Install, calibrate, maintain, and operate according to manufacturer's specifications, a device that indicates the cumulative amount of volatile matter recovered by the SRS on a monthly basis. The device must be certified by the manufacturer to be accurate to within +/- 2.0 percent by mass.

Location on Control Equipment: Near solvent recovery tank

Rationale for monitoring approach: Solvent collection and recovery efficiency (R_r) is used to calculate compliance with the applicable emission standard. Solvent recovery shall be directly measured on a daily basis through the use of a meter at the SRS. Solvent recovery is expressed as a percentage when compared to solvent applied at the coating line. Solvent applied is determined each day according to compliance demonstration requirements applicable to the subject emission standard. Consequently, both parameters required to determine solvent recovery efficiency are readily available on a daily basis.

Frequency of measurement: Daily. The source owner or operator shall obtain data each day on the solvent usage (recordkeeping required by Rule 1040 (6), (7) and (8)) and solvent recovery (meter readings) and determine the solvent recovery efficiency (R_r) of the system for each day using a 30 day rolling period.

Calculation: Daily. The recovery efficiency for each operating day is computed as the ratio of the total recovered solvent for that day and the prior 29 consecutive operating days to the total solvent usage on coating applicators controlled by the SRS for the same 30-day period weighted average, consistent with equations A, B, and C in Section II of Appendix 7. The ratio shall be computed within 72 operating hours of each 24-hour period. (Reference R 336.2040 (10)(a)(i)).

Corrective Action Trigger: Overall collection and recovery efficiency averaged over a 30-day period that is below the Corrective Action Trigger specified in the Malfunction Abatement Plan (MAP).

Corrective Action Period: Inspect and isolate problem within 24 hours of discovery. Implement a solution within seven days.

QA/QC Procedures: Calibrate, maintain, and operate instrumentation according to the manufacturer's recommendations. Update Malfunction Abatement Plan based on additional information obtained from actual operation, monitoring and maintenance of the SRS and its associated monitoring equipment.

II. MONITORING PROGRAM DESCRIPTION REGENERATIVE THERMAL OXIDIZER (RTO) DESTRUCTION EFFICIENCY FOR FG-COATINGPROCESS

Monitored Parameter: RTO combustion chamber temperature

Monitoring Devices: Combustion chamber temperature sensor (thermocouple) and continuous recording device: The temperature measurement device shall have an accuracy of greater than +/- 0.75% of the temperature being measured expressed as degree Celsius or +/- 2.5 degrees C. The temperature monitoring device shall be equipped with a recording device so that a permanent, continuous record of the temperature is produced.

Location on Control Device: At the combustion chamber.

Rationale for Monitoring Approach: The VOC emissions from EU-COATINGLINE1, EU-COATINGLINE3, EU-COATINGLINE4, and EU-PILOT-LINE are controlled with an RTO. A minimum temperature is required to fully combust the VOC, with the assumption that the oxidizer is designed with adequate turbulence and residence time. A low temperature may indicate incomplete combustion dependent on other parameters such as VOC loading, mixing and residence time. The permittee conducted performance testing of the RTO on October 24–27, 2005 and demonstrated that the acceptable minimum temperature provides adequate destruction efficiency. Thus, temperature is an appropriate monitoring parameter to ensure sufficient control efficiency on a continuous basis.

Frequency of Measurement: Continuous

Corrective Action Trigger: $\leq 1444^{\circ}$ F, or temperature value established during the most recent stack test (calculated as a three-hour average)

Corrective Action Period: Inspect and isolate problem within 24 hours of discovery. Implement a solution within one to seven days, depending on severity.

QA/QC Procedures: Calibrate, maintain, and operate instrumentation according to the manufacturer's recommendations. Update Malfunction Abatement Plan based on additional information obtained from actual operation, monitoring and maintenance of the RTO and its associated monitoring equipment.

Appendix 4. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in Rule 287(2)(c), FG-RULE290 and FG-COATINGBOOTHs. Alternative formats must be approved by the AQD District Supervisor.

- A. To document monthly spray booth coating usage records and other records as required by R336.1287(2)(c) and Table FG-COATINGBOOTHs, the permittee shall use the **EGLE** Rule 287(2)(c) Permit to Install Record Form (EQP 3562) or an alternative format as approved by the AQD District Supervisor. The Record Form is available on the EGLE Website at the following address (https://www.michigan.gov/documents/deq/deq-ead-caap-airpermit-eqp3562_312633_7.pdf).
- B. To document monthly adhesive coating usage records and other records as required by R336.1290 and Table FGRULE290, the permittee shall use the EGLE Rule 290 Permit to Install Record Form (EQP 3558) or an alternative format as approved by the AQD District Supervisor. The Record Form is available on the EGLE

Website at the following address (https://www.michigan.gov/documents/deq/deq-ead-caap-airpermit-eqp3558_292054_7.pdf).

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in FG-MACT HHHHH. Alternative formats must be approved by the AQD District Supervisor.

- A. If a control device used to comply with 40 CFR Part 63, Subpart HHHHH is also subject to monitoring, recordkeeping and reporting requirements in 40 CFR Part 264, Subpart AA, BB or CC; or monitoring and recordkeeping requirements in 40 CFR Part 265, Subpart AA, BB or CC; and the permittee complies with the periodic reporting requirements under 40 CFR Part 264, Subpart AA, BB or CC, the permittee may elect to comply with the monitoring, recordkeeping and reporting requirements of 40 CFR Part 63, Subpart HHHHH; or the monitoring and recordkeeping requirements of 40 CFR part 264 or 265 and the reporting requirements in 40 CFR Part 264. If the permittee elects to comply with the monitoring, recordkeeping and reporting requirements of 40 CFR Parts 264 and/or 265, the information required for the compliance report in 40 CFR 63.8075(e) must be reported and the notification of compliance status report required by 40 CFR 63.8075(d) must identify the monitoring, recordkeeping and reporting authority under which the permittee will comply. **(40 CFR 63.8090(a))**
- B. For any equipment that is subject to 40 CFR Part 63, Subpart HHHHH and is also subject to 40 CFR Part 264, Subpart BB or 40 CFR Part 265, Subpart BB, compliance with recordkeeping and reporting requirements of 40 CFR Part 264 and/or 265 may be used to comply with the recordkeeping and reporting requirements of 40 CFR 63.1255, to the extent that the requirements of 40 CFR Part 264 and/or 265 duplicate the requirements of 40 CFR Part 63, Subpart HHHHH. The permittee shall identify, in the notification of compliance status report required by 40 CFR 63.8075(d) compliance with the recordkeeping and reporting authority under 40 CFR Part 264 and/or 265. **(40 CFR 63.8090(b))**
- C. Any storage tank for which predominant use is associated with miscellaneous coating manufacturing operations that is both controlled with a floating roof and in compliance with the provisions of 40 CFR Part 60, Subpart Kb, shall be considered in compliance with 40 CFR Part 63, Subpart HHHHH. Any storage tank for which predominant use is associated with miscellaneous coating manufacturing operations with a fixed roof, closed-vent system, and control device in compliance with 40 CFR Part 60, Subpart Kb, shall be considered in compliance with 40 CFR Part 63, Subpart HHHHH, however, the permittee must comply with the monitoring, recordkeeping and reporting requirements in 40 CFR Part 63, Subpart HHHHH. The permittee must identify in the notification of compliance status report required by 40 CFR 63.8075(d) which storage tanks are in compliance with 40 CFR Part 60, Subpart Kb. **(40 CFR 63.8090(c))**

Appendix 5. Testing Procedures

The permittee shall use the following approved test plans, procedures, and averaging to measure the pollutant emissions for the applicable requirements referenced in FG-COATINGPROCESS as they relate to 40 CFR Part 63-National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (POWC MACT).

The permittee shall conduct performance tests as required by 40 CFR 63.3360, as follows:

For organic HAP content of each coating material, use the procedures of 40 CFR 63.3360(c).

For volatile organic and solids content of each coating material, use the procedures of 40 CFR 63.3360(d).

For oxidizer destruction efficiency, use the procedures of 40 CFR 63.3360(e).

For capture efficiency, use the procedures of 40 CFR 63.3360(f).

For Volatile matter retained in the coated web or otherwise not emitted to the atmosphere, use the procedures of 40 CFR 63.3360(g).

For multiple control devices in series, use the procedures of 40 CFR 63.3360(h).

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-A6220-2015. 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-A6220-2015a is being reissued as Source-Wide PTI No. MI-PTI-A6220-2021.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201600112	Remove Consent Order references in the ROP, since the Consent Orders were terminated December 9, 2015, and remove Condition VI.5 in FG-COATING PROCESS because it is no longer applicable and covered under another Condition.	FG-COATINGPROCESS
81-14	201900119*	Add conditions in 81-14 to ROP/Source-wide PTI.	EU-WETMIXEXTRUDER

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the 4.79 pounds per gallon of solids applied, based on a 24-hour averaging period limit in FG-COATINGPROCESS SC I.1. If "P_b", calculated according to equation 1 below, is less than or equal to the limit in FG-COATINGPROCESS SC I.1, the coating line meets the emission limit.

- Determine the volume-weighted average weight of volatile organic compounds per gallon of coating solids, as applied, "P_b," by using the following equation:

$$P_b = \frac{M}{V}$$

Where:

M = Total weight of VOC emitted (in pounds) from the coating lines during the averaging period calculated using equation 1.1.

V = Volume of solids (in gallons) in all coatings used during the averaging period calculated using equation 1.2.

- 1.1. Calculate the total weight of VOC emitted (in pounds) from the coating lines during the averaging period (M) using the following equation:

$$M = M_j - C_s - C_T$$

Where:

M_j = Weight of VOC (in pounds) applied during the 24 hour averaging period at coating line "j" calculated using equation 1.1.1.

C_s = Amount of solvent recovered by the SRS (in pounds) during the averaging period calculated using equation 1.1.2.

C_T = Amount of VOC (in pounds) destroyed by the RTO during the averaging period calculated using equation 1.1.3.

- 1.1.1. Calculate the weight of VOC (in pounds) applied during the 24 hour averaging period at a coating line “j” (M_j) using the following equation: **[R.336.2040(12)(b)(iii) and R 336.2040(6)]**

$$M_j = \sum_{i=1}^z L_{ci} P_j$$

Where:

L_{ci} = Daily usage (volume) of each coating “i” (gallons of coating, minus water, as applied) on coating line “j” during the 24-hour averaging period

P_j = VOC content of coating “i” (pounds VOC per gallon of coating i, minus water, as applied) on coating line “j” during the 24-hour averaging period

z = Total number of coatings used on the line during the 24-hour averaging period

- 1.1.2. Calculate the amount of Solvent Recovered (in pounds) during the averaging period (C_s) using the following equation:

$$C_s = R_r \sum_{i=1}^y L_{ci} P_i$$

Where:

R_r = Solvent Recovery Efficiency (R_r) calculated using the equation in 1.1.2.1.

y = Total number of coatings applied on a coating line during the 24-hour averaging period at an applicator that exhausts to the carbon adsorption solvent recovery system

- 1.1.2.1. Calculate the Solvent Recovery Efficiency (R_r) using the following equation **[R 336.2040(12)(b)(vi), R 336.2040(11)(c),R 336.2040(10)(a)]**

$$R_r = \frac{\sum_{l=1}^{30} d v_l}{\sum_{l=1}^{30} M_l}$$

Where:

d = Density of the solvent (pounds VOC per gallon of solvent)

v_l = Volume (gallons) of the solvent recovered from all coating lines during a 24- hour averaging period, where l 1 for day 1

l = Total number of days in the rolling period (30)

M_l = Weight of VOC (in pounds) applied during the 24-hour averaging period at all coating applicators and associated ovens at the facility calculated using equation 1.1.2.1.1.

- 1.1.2.1.1. Calculate the weight of VOC (in pounds) applied during the 24-hour averaging period at all coating applicators and associated ovens at the facility (M_1) that exhaust to the SRS using the following equation:

$$M_1 = \sum_{i=1}^x M_j$$

Where:

x = Total number of coating applicators and associated ovens at the facility that exhaust to the SRS

- 1.1.3. Calculate the weight of VOC (in pounds) destroyed by the Regenerative Thermal Oxidizer (C_T) using the following equation:

$$C_T = DE \sum_{i=1}^z M_{(RTO)di} * N_{(RTO)di}$$

Where:

$M_{(RTO)di}$ = The daily amount of VOC in each coating “i” applied at a coating line applicator that exhausts to the regenerative thermal oxidizer (RTO).

$N_{(RTO)di}$ = The RTO capture efficiency of the VOC applied at each coating line applicator.

DE = VOC destruction efficiency of the RTO.

z = Total number of coatings used on the line during the 24-hour averaging period

- 1.2. Calculate the total applied coating solid (V_s) using the following equation:

$$V_s = \sum_{i=1}^z L_{ci} f_{si}$$

Where:

f_{si} = solid volume fraction of coating “i”

2. The permittee shall keep records as provided in the Subparagraph below in conjunction with the compliance calculation methods of Paragraph 1, monitoring, and testing data, to determine compliance with the applicable requirements referenced in FG-COATINGPROCESS.

- 2.1. The permittee shall keep records of the following data elements to demonstrate, on a daily basis, compliance with the equivalent emission limit as determined in Subparagraph I.

2.1.1. The name, identification number, volume (L_{ci}) and VOC content, as determined by formulation data or Method 24 testing, (P_i) of each coating

2.1.2. The mass of VOCs (M) applied at a coating line during a 24-hour period

2.1.3. The VOC density of the solvent recovered (d)

2.1.4. The daily volume of the solvent recovered (v_i)

2.1.5. The daily amount of VOC in each coating “i” applied at a coating line applicator that exhausts to the RTO ($M_{(RTO)di}$)

2.1.6. The RTO capture efficiency of the VOC applied at each coating line applicator ($N_{(RTO)di}$)

2.1.7. Daily VOC destruction by the thermal oxidizer (C_T)

2.1.8. Solid volume fraction of coating “i” (f_{si})

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

Appendix 9. Malfunction Abatement Plans

The permittee shall implement and maintain a Malfunction Abatement Plan for FG-COATINGPROCESS.

An approved malfunction abatement plan, dated May 21, 1999, was submitted to the District Supervisor. The approved plan covers the Vapor Phase Carbon Adsorption Solvent Recovery System and the Regenerative Thermal Oxidizer air pollution control equipment. Any modifications to the plan shall be submitted to the AQD District Supervisor for approval and are subject to review by the AQD. Records in support of the activities required by the plan shall be maintained. These records shall be made available upon inspection of the facility, or as otherwise requested by the AQD.

Appendix 10. POWC MACT Emission Calculations

If the permittee uses a combination of control devices that requires using a liquid-liquid material balance and performance test to determine capture and control efficiencies, the permittee shall calculate the total organic HAP emitted during the month from EUACOATINGLINE1, EUACOATINGLINE2, EUACOATINGLINE4, and EUPILLOT-LINE using Equation 1.

Equation 1.

$$H_e = \left[\sum_{i=1}^p M_{Ci} C_{ahi} \right] - \left[\frac{R_v}{100} * \sum_{i=1}^p M_{Ci, SRS} C_{ahi} \right] - \left[\frac{R}{100} * \sum_{i=1}^p M_{Ci, RTO} C_{ahi} \right] + \left[\sum_{i=1}^p M_{Bi} C_{ahi} \right] - M_{vret}$$

Where:

- H_e = Total monthly organic HAP emitted, kg.
- p = Number of different coating materials applied in a month.
- M_{Ci} = Mass of coating material, i , as-applied on intermittently-controlled work stations operating in controlled mode and the mass of coating material, i , as-applied on always controlled work stations, in a month, kg.
- $M_{Ci, SRS}$ = Mass of coating material, i , as-applied on intermittently-controlled work stations operating in SRS-controlled mode and the mass of coating material, i , as-applied on always SRS-controlled work stations, in a month, kg.
- $M_{Ci, RTO}$ = Mass of coating material, i , as-applied on intermittently-controlled work stations operating in RTO-controlled mode and the mass of coating material, i , as-applied on always RTO-controlled work stations, in a month, kg.
- C_{ahi} = Monthly average, as-applied, organic HAP content of coating material, i , expressed as a mass fraction, kg/kg.
- R_v = Organic volatile matter collection and recovery efficiency of the Solvent Recovery System, percent.
- R = Overall organic HAP control efficiency of the Regenerative Thermal Oxidizer, percent

M_{Bi} = Mass of coating material, i , as-applied on intermittently-controlled work stations operating in bypass mode and the mass of coating material, i , as-applied on always never-controlled work stations, in a month, kg

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in this section.

Equation 2.

$$R_v = \frac{M_{vr} + M_{vret}}{\sum_{i=1}^p C_{vi} M_{Ci,SRS} + \sum_{i=1}^q C_{vij} M_{Cij,SRS}} \times 100$$

Where:

R_v = Organic volatile matter collection and recovery efficiency, percent.

M_{vr} = Mass of volatile matter recovered in a month, kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where Permittee chooses to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 40 CFR 63.3370

p = Number of different coating materials applied in a month.

C_{vi} = Volatile organic content of coating material, i , expressed as a mass fraction, kg/kg.

$M_{Ci,SRS}$ = Mass of as-purchased coating material, i , applied on intermittently-controlled work stations operating in controlled mode and the mass of as-purchased coating material, i , on always controlled work stations, in a month, kg.

q = Number of different materials added to the coating material.

C_{vij} = Volatile organic content of material, j , added to as-purchased coating material, i , expressed as a mass fraction, kg/kg.

$M_{Cij,SRS}$ = Mass of material, j , added to as-purchased coating material, i , applied on intermittently-controlled work stations operating in controlled mode and the mass of material, j , added to as-purchased coating material, i , applied on always controlled work stations in a month, kg.