April 25, 2019
Project No. 181666

Mr. Rex Lane
Kalamazoo District Office
Air Quality Division
Michigan Department of Environment, Great Lakes and Energy
7953 Adobe Road
Kalamazoo, MI 49009-5026

Re: Renewable Operating Permit Renewal Application MI-ROP-B1678-2015

Dear Mr. Lane:

Fishbeck, Thompson, Carr & Huber, Inc. (FTCH) has completed a Renewable Operating Permit (ROP) Renewal Application for MI-ROP-B1678-2015 for Graphic Packaging International, LLC, located at 1421 and 1500 North Pitcher Street, Kalamazoo, Michigan. The renewal application is due no later than October 15, 2019. This application includes two sections.

The following is provided for Section 1:

- EQP 6000 ROP Application Form
- EQP 5774 Additional Information Forms
- Marked-Up Copy of MI-ROP-B1678-2015 (complete copy including Sections 1 and 2)
- Malfunction Abatement Plan (Appendix 1.9 of marked-up copy of ROP)
- Associated Support Documents

The following is provided for Section 2:

- EQP 6000 ROP Application Form
- EQP 5774 Additional Information Form
- Associated Support Documents

An electronic copy of the application and supporting documents will be provided to the Michigan Department of Environment, Great Lakes and Energy (EGLE), which reduces the EGLE application administrative completeness review to 15 days (a printed copy will follow by UPS). If you have any questions or require additional information, please contact me at 616.464.3721.

Sincerely,

FISHBECK, THOMPSON, CARR & HUBER, INC.

Susan L. Kuieck, PE

lkj
Attachments
By email and UPS
cc/att: Ms. Monica Brothers – EGLE
Mr. Donald Krug – Graphic Packaging International, LLC (By email only)
Mr. Spencer Macko – Graphic Packaging International, LLC (By email only)

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RENEWABLE OPERATING PERMIT
RENEWAL APPLICATION FORM

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

GENERAL INSTRUCTIONS

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

PART A: GENERAL INFORMATION

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

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
B1678	2631	322130	MI-ROP-B1678-2015	1

Source Name
Graphic Packaging International, LLC

Street Address
1500 North Pitcher Street

City	State	ZIP Code	County
Kalamazoo	MI	49007	Kalamazoo

Section/Town/Range (if address not available)

Source Description
The paperboard mill facility operates industrial boilers and two paperboard machines with paperboard coating processes, which includes several refrigerant containing chillers and air dyers.

☐ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
Graphic Packaging International, LLC	1

Mailing address (☐ check if same as source address)
1500 Riveredge Parkway Suite 100

City	State	ZIP Code	County	Country
Atlanta	GA	30328	Fulton	USA

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

SRN: B1678	Section Number (if applicable): 1

PART A: GENERAL INFORMATION (continued)

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

CONTACT INFORMATION

Contact 1 Name			Title	
Donald Krug			Environmental Engineer	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
269.383.5440		Donald.Krug@graphicpkg.com		

Contact 2 Name (optional)			Title	
Susan Kuieck			Consultant	
Company Name & Mailing address (☐ check if same as source address)				
FTCH, 1515 Arboretum Drive SE				
City	State	ZIP Code	County	Country
Grand Rapids	MI	49546	Kent	USA
Phone number		E-mail address		
616.464.3721		slkuieck@ftch.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name			Title	
Richard W. Townley			Mill Manager	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
269.383.5015		Rich.Townley@graphicpkg.com		

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

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

SRN: B1678	Section Number (if applicable): 1

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

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

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

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

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

Richard W. Townley - Mill Manager

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

Richard W Townley — **Signature of Responsible Official**

4/22/2019 — **Date**

SRN: B1678	Section Number (if applicable): 1

PART C: SOURCE REQUIREMENT INFORMATION

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

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☒ Yes ☐ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☒ No ☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☐ Yes ☒ No
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☐ Yes ☒ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No ☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to the MDEQ, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	☐ Yes ☒ No ☐ Yes ☒ No ☐ ☐
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☒ Yes ☐ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☐ Yes ☒ No

☒ Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-**Mark-Up, AI-PartC_Sec1

SRN: B1678	Section Number (if applicable): 1

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

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

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☒ Yes ☐ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]
EU01NATGASHEATER	Natural gas space heaters	Rule 212(4)(c)	Rule 282(b)(i)
EU10LOCKERBOILER	1.9 MMBTU/hr boiler	Rule 212(4)(c)	Rule 282(b)(i)
EUMAINTBOILER	0.2 MMBTU/hr boiler	Rule 212(4)(c)	Rule 282(b)(i)
EURETAIDTANK7.5K	7,500 gallon retention aid tank	Rule 212(4)(d)	Rule 284(i)
EURETAIDTANK4K	4,000 gallon retention aid tank	Rule 212(4)(d)	Rule 284(i)
EUK1LATEX1	10,000 gallon latex tank	Rule 212(4)(d)	Rule 284(i)
EUK1LATEX2	10,000 gallon latex tank	Rule 212(4)(d)	Rule 284(i)
EUK3LATEX	6,000 gallon latex tank	Rule 212(4)(d)	Rule 284(i)
EUROOFUNITS	Rooftop heating units	Rule 212(4)(c)	Rule 284(i)

Comments:

Exempt equipment predates the December 2016 rule revisions. Therefore, historical exemption rule references, consistent with the previouse ROP renewal application, have been used.

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

SRN: B1678	Section Number (if applicable): 1

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☒ Yes ☐ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No

Comments:
E1: Changes are identified in Part H

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

SRN: B1678	Section Number (if applicable): 1

PART F: PERMIT TO INSTALL (PTI) INFORMATION

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

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

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

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

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

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

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

Comments:

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

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

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

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.

If Yes, identify the emission units in the table below. If No, go to Part H. ☐ Yes ☒ No

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

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

Comments:

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

SRN: B1678	Section Number (if applicable): 1

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

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

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

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

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

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

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

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. For EUBOILER#8, requirements for CAIR have been removed from the ROP. Because the units are still subject to the requirements of the NOx State Implementation Plan (SIP) Call, language concerning the NOx SIP Call has been inserted into the ROP mark up. See AI-Mark-Up	☒ Yes ☐ No
H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
☒ Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-**Mark-Up	

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

	SRN: B1678	Section Number (if applicable): 1

1. Additional Information ID
AI-

Additional Information

2. Is This Information Confidential? ☐ Yes ☐ No

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

	SRN: B1678	Section Number (if applicable): 1

1. Additional Information ID
AI-Mark-Up

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

A mark-up of the ROP is attached.

EUBOILER#8 was previously subject to the USEPA Clean Air Interstate Rule (CAIR); however, this rule has been replaced with the USEPA Cross-State Air Pollution Rule (CSAPR). CSAPR only regulates stationary, fossil fuel-fired boilers and turbines, which are located in a covered state any time after 2005, have a nameplate capacity of more than 25 MW, and are producing electricity for sale. EUBOILER#8 is not used to generate electricity for sale; therefore, it is not subject to the CSAPR requirements.

Requirements for CAIR have been removed from the ROP. Because the unit is still subject to the requirements of the NOx State Implementation Plan (SIP) Call, language concerning the NOx SIP Call has been inserted into the ROP mark-up:

> The permittee shall meet the monitoring, record keeping, and reporting requirements of the NOx SIP Call during the ozone season (May 1 through September 30), in accordance with 40 CFR Part 96, Subpart H.

This will cover the unit's NOx SIP Call requirements, as it is not in CSAPR, but is still required to comply with the NOx SIP Call.

ROP No: MI-ROP-B1678-2015
Expiration Date: April 15, 2015
PTI No: MI-PTI-B1678-2015

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

EFFECTIVE DATE: April 15, 2015

ISSUED TO

Graphic Packaging International, ~~Inc~~LLC~~.~~

State Registration Number (SRN): B1678

LOCATED AT

1421 and 1500 North Pitcher Street, Kalamazoo, Michigan 49007

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B1678-2015

Expiration Date: April 15, 2020

Administratively Complete ROP Renewal Application Due Between October 15, 2018 and October 15, 2019

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B1678-2015

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

Michigan Department of Environmental Quality

Mary A. Douglas, Kalamazoo District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

SECTION 1 - MILL

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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
    b. A limit specified by an applicable federal new source performance standard.

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

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

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).[2] **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.

c. The company or entity that performed the analyses of the samples.
d. The analytical techniques or methods used.
e. The results of the analyses.
f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP **(R 336.1213(3)(c))**:
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.
22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
    a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
    b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete”. The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.[2] **(R 336.1912)**

Permit Shield

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

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

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
    d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not

expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.

37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original

equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. [2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. [2] **(R 336.1201(8) Section 5510 of Act 451)**

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ. [2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. [2] **(R 336.1201(4))**

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. The stationary source-wide, Section 1 and Section 2 combined, emission rate of an individual HAP shall be less than 9.9 tons per 12-month rolling time period. **(R 336.1213(2))**

2. The stationary source-wide, Section 1 and Section 2 combined, emission rate of total combined HAPs shall be less than 24.9 tons per 12-month rolling time period. **(R 336.1213(2))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall calculate and record the stationary source-wide, Section 1 and Section 2 combined, emission rates, in tons, for each single HAP and total combined HAPs for each calendar month and each 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))**

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). **(R 336.1213(4)(c))**

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUBOILER#7	Boiler No. 7 - Natural gas fired boiler with heat input of approximately 127 MMBTU/hr.	01-01-50 01-01-68	NA
EUBOILER#8	Boiler No. 8 - Natural gas and No. 6 fuel oil fired boiler with a maximum heat input of 240 MMBTU/hr.	01-01-59 01-01-68	NA
EUBOILER#9	Boiler No. 9 - Natural gas and fuel oil fired boiler equipped with low NO_x burners and flue gas recirculation with a maximum heat input of approximately 227 MMBTU/hr.	10-01-91 NA	NA
EUK1MACHINE	K1 paperboard machine with in-line paperboard coating process. It includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, bar coater, ~~air-knife~~curtain coater, six drying ovens, starch preparation and handling equipment, and starch application equipment.	01-01-91 10-20-11 09-12-13	NA
EUK3MACHINE	K3 paperboard machine with in-line paperboard coating process. It includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, a bar coater, an air-knife coater, drying ovens, starch preparation and handling equipment, and starch application equipment.	01-01-37 05-01-98 10-20-11	NA
EUCONVERTDEPT	Off-line paperboard coater located in the converting department.	01-01-83 NA	NA
EUCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201, pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	<07-01-79 >07-01-79	FGCOLDCLEANERS
EUCONVERTETHYLACETATE	Ethyl acetate used to clean wax off the “back-up rolls” on converting coater.	01-01-83 NA	FGRULE290
EUMILLCYCLONES	Cyclones that control the converting department trimmer.	01-01-83 NA	FGRULE290

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUFIREPUMP	Diesel powered emergency fire pump rated at 185 bhp.	1982 NA	FG-EMERG-RICE
EU01GASTANK	An existing stationary gasoline dispensing facility located at an area source of hazardous air pollutant that has a maximum monthly gasoline throughput of <10,000 gallons.	01-01-97 NA	NA

EUBOILER#7
EMISSION UNIT CONDITIONS

DESCRIPTION

Boiler No. 7 - Natural gas fired boiler with heat input of approximately 127 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. EUBOILER#7 shall only be fired with sweet natural gas.[2] **(R 336.1201(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 shall monitor and record the natural gas consumption rate, in million cubic feet, for each calendar month. **(R 336.1213(3)(b))**

See Appendix 1.4

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 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBOILER#7	88.0[2]	80.0[2]	**R 336.1201(3)**

IX. OTHER REQUIREMENT(S)

NA

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

EUBOILERS#8
EMISSION UNIT CONDITIONS

DESCRIPTION

Boiler No. 8 - Natural gas and No. 6 fuel oil fired boiler with a maximum heat input of 240 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Sulfur Content in Fuel Oil	Equivalent of 1.5%[2]	See below *[2]	EUBOILER#8	SC VI.5	**R 336.1401(1) - Table 41**

*The maximum sulfur content in fuel is defined as the average sulfur content in all fuels burned, including natural gas, at any one time in a power plant. The sulfur content shall be calculated on the basis of 18,000 BTUs per pound of liquid fuels.

2. Any boiler that is gaseous fuel fired and also has the capability of using liquid fuel and does not have the capability of biomass and/or coal firing, shall be considered a gaseous fuel fired boiler unless the liquid fuel use is greater than 48 hours per calendar year for periodic testing, at which time the unit is designated as an existing oil subcategory. The use of liquid fuel during gas curtailments, gas supply interruption, startups or periodic testing does not change a boiler's designation from a gaseous fuel fired boiler to an oil subcategory. **(40 CFR 63.11237)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The maximum heat input shall not exceed 240 million BTU per hour. **(R 336.1213(2)(d), R 336.1205(1)(a))**

2. EUBOILER#8 shall only be fired with sweet natural gas and/or fuel oil.[2] **(R 336.1201(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 shall monitor and record the actual hours of operation for each operating day. The permittee shall also monitor and record the total hours of operation for each calendar month. **(R 336.1213(3))**

2. The permittee shall monitor and record the fuel oil consumption rates, in gallons, for each operating day. The permittee shall also monitor and record the total fuel oil consumption rate, in gallons, for each calendar month. **(R 336.1213(3)(b))**

3. The permittee shall monitor and record the natural gas consumption rate, in million cubic feet, for each operating day. The permittee shall also monitor and record the total natural gas consumption rate, in million cubic feet, for each calendar month. **(R 336.1213(3)(b))**

4. The permittee shall calculate the total average daily heat input. The average daily heat input shall be calculated by multiplying the total of each fuel consumed by the standard heating value for the respective fuel and by dividing by the actual operating hours for that calendar day. The permittee need not perform these calculations on a daily basis. The permittee may elect to perform all calculations at the end of each calendar month. The calculations may be performed manually or the daily data may be entered into an electronic system and calculated electronically at the end of the calendar month. **(R 336.1213(3))**

5. The permittee shall maintain a complete record of the fuel oil analysis of all fuel oil shipments, as supplied by the vendor. This record shall include the percent sulfur content and the BTU rating per pound of liquid fuel. **(R 336.1213(3)(b))**

6. While firing residual fuel oil (residual fuel oil means fuel oil grades no. 3 through no. 6), the permittee shall perform and record the results of a six-minute visible emission check of SVBOILER#8 immediately after each start-up occurrence and at least once per calendar day thereafter during maximum routine operating conditions. If visible emissions are observed, the permittee shall implement the monitoring program listed in Appendix 1.3. **(R 336.1213(3))**

See Appendix 1.3

VII. REPORTING

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBOILER#8	NA	115.0[2]	**R 336.1201(3)**

IX. OTHER REQUIREMENT(S)

The permittee shall implement the Malfunction Abatement Program outlined in Appendix 1.9 when visible emissions have been observed (see VI.6 above and Appendix 1.3). **(R 336.1213(3))**

1. The permittee shall meet the monitoring, record keeping, and reporting requirements of the NOx SIP Call during the ozone season (May 1 through September 30), in accordance with 40 CFR Part 96, Subpart H.

~~2. The permittee shall comply with the CAIR Ozone NOx Trading Program provisions of 40 CFR, Part 97.301 through 40 CFR, Part 97.388 as adopted and modified by R 336.1802a, R 336.1803 and R 336.1821 through R 336.1826 and as outlined in any complete CAIR Ozone NOx Permit issued by the AQD. The CAIR Ozone NOx Permit No. MI-NOO-10698-2015 is hereby incorporated into this ROP as Appendix 1.10. **(R 336.1821)**~~

~~3.~~2. ~~The permittee shall hold allowances for compliance deductions in the source's compliance account of the allowance transfer deadline in an amount not less than the total NOx emissions for the control period from the source pursuant to 40 CFR, Part 97.354. **(40 CFR, Part 97.354)**~~

Footnotes:

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

EUBOILER#9
EMISSION UNIT CONDITIONS

DESCRIPTION

Boiler No. 9 - Natural gas and fuel oil fired boiler equipped with low NO_x burners and flue gas recirculation with a maximum heat input of approximately 227 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Low NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

1. The NOx emission rate, when firing natural gas only, shall not exceed 0.06 pounds per MMBTUs of heat input based upon a 24-hour averaging period.[2] **(40 CFR 52.21(j))**

2. The NOx emission rate, when firing natural gas only, shall not exceed 13.6 pph.[2] **(40 CFR 52.21(j))**

3. The NOx emission rate, when firing fuel oil only, shall not exceed 0.20 pounds per MMBTUs of heat input based upon a 24-hour averaging period.[2] **(40 CFR 60.44b(a), 40 CFR 52.21(j))**

4. The NOx emission rate, when firing fuel oil only, shall not exceed 43.42 pph.[2] **(40 CFR 60.44b(a), 40 CFR 52.21(j))**

5. The total NOx emission rate shall not exceed 69.3 tpy, based upon a 12-month rolling time period.[2] **(40 CFR 52.21(j))**

6. The particulate emission rate, when firing fuel oil only, shall not exceed 0.03 pounds per MMBTUs of heat input.[2] **(R 336.1201(3))**

7. The particulate emission rate, when firing fuel oil only, shall not exceed 6.51 pph.[2] **(R 336.1201(3))**

8. The particulate emission rate, when firing fuel oil, shall not exceed 2.12 tpy, based upon a 12-month rolling averaging period.[2] **(R 336.1201(3))**

9. The SO2 emission rate, when firing fuel oil, shall not exceed 0.48 pounds per MMBTUs heat input, based upon a 24 hour averaging period.[2] **(R 336.1201(3))**

10. The SO2 emission rate, when firing fuel oil only, shall not exceed 104.2 pph.[2] **(R 336.1201(3))**

11. The total SO2 emission rate shall not exceed 34.0 tpy, based upon a 12-month rolling time period.[2] **(R 336.1201(3))**

12. The total gaseous non-methane organics emissions, measured as methane, when firing natural gas and/or fuel oil, shall not exceed 0.025 pounds per MMBTUs heat input.[2] **(R 336.1702(a))**

13. The total gaseous non-methane organics emissions, measured as methane, when firing natural gas and/or fuel oil, shall not exceed 5.7 pph.[2] **(R 336.1702(a))**

II. MATERIAL LIMIT(S)

1. The maximum sulfur content in fuel oil shall not exceed the equivalent of 0.44% as calculated on the basis of 18,300 BTUs per pound of liquid fuels in the EUBOILER#9.[2] **(R 336.1201(3))**

2. The "annual capacity factor," for fuel oil firing in EUBOILER#9 shall not exceed 0.0715.[2] **(R 336.1201(3))**

3. Any boiler that is gaseous fuel fired and also has the capability of using liquid fuel and does not have the capability of biomass and/or coal firing, shall be considered a gaseous fuel fired boiler unless the liquid fuel use is greater than 48 hours per calendar year for periodic testing, at which time the unit is designated as an existing oil subcategory. The use of liquid fuel during gas curtailments, gas supply interruption, startups or periodic testing does not change a boiler's designation from a gaseous fuel fired boiler to an oil subcategory. **(40 CFR 63.11237)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not fire EUBOILER#9 with fuel oil unless a continuous opacity monitor is installed and operating properly. **(40 CFR 60.48b(a))**

2. The permittee shall not operate EUBOILER#9 unless the flue gas recirculation system and the low NOx burners are operating properly.[2] **(R 336.1910)**

3. The continuous monitoring systems required by 40 CFR 60.48b(b) shall be operated and data recorded during all periods of operation, except for continuous monitoring system breakdowns and repairs. Data should also be recorded during calibration checks and zero and span adjustments. **(40 CFR 60.48b(c))**

4. The 1-hour average NOx emission rates measured by the continuous NOx monitor shall be expressed in ng/J or lb/million BTU heat input and shall be used to calculate the average emission rates under 40 CFR 60.44b. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(b). At least 2 data points must be used to calculate each 1-hour average. **(40 CFR 60.48b(d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. EUBOILER#9 shall be equipped with a flue gas recirculation system and low NOx burners.[2] **(40 CFR 52.21(j))**

2. EUBOILER#9 shall be equipped with a continuous emission monitor system (CEMS) to record NOx emissions. **(40 CFR 60.13(n), 40 CFR 60.48b(b))**

V. TESTING/SAMPLING

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

1. The permittee shall determine the SO2 emission rate, by testing, within 180 days of initiating the use of fuel oil using a test method that has been approved by the AQD or EPA. **(R 336.1213(3))**

2. For the CEMS, Cylinder Gas Audits (CGA) on the NOx and oxygen span gases shall be conducted and recorded in accordance with Quality Assurance methods described in 40 CFR Part 60 Appendix F. The CGA shall be conducted in three of four calendar quarters, but in no more than three quarters in succession.[2] **(R 336.1201(3), 40 CFR Part 60 Appendix F)**

3. For the CEMS, a Relative Accuracy Test Audit (RATA) on the NOx and oxygen CEMS shall be conducted and recorded in accordance with Quality Assurance methods described in 40 CFR Part 60 Appendix F. The RATA shall be conducted at least once every four calendar quarters.[2] **(R 336.1201(3), 40 CFR Part 60 Appendix F)**

4. The permittee shall perform testing for NOx once during the term of this permit for EUBOILER#9. **(R 336.1213(3))**

5. The permittee shall perform testing for total gaseous non-methane organics emissions, measured as methane, once during the term of this permit for EUBOILER#9. **(R 336.1213(3))**

See Section VII below

VI. MONITORING/RECORDKEEPING

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

1. When firing fuel oil, the permittee shall perform the following:
   a. Monitor and record opacity emissions on a continuous basis[2], **(40 CFR 60.48b(a))**
   b. Record the fuel oil consumption rates, in gallons, for each calendar day and calendar month[2] **(40 CFR 60.49b(d))**
   c. Maintain a complete record of the fuel oil analysis of all fuel oil shipments, as supplied by the vendor. The record shall include the percent sulfur content and the BTU rating per pound of liquid fuel.[2] **(40 CFR 60.49b(r))**
   d. Calculate and record the "annual capacity factor" for the fuel oil combusted on a monthly basis. The "annual capacity factor" shall be based upon a 12-month averaging period, with a new "annual capacity factor" being calculated at the end of each calendar month (See Appendix 1.7).[2] **(40 CFR 60.49b(d))**
   e. Calculate and record the SO2 emission rates, in pph and tons per calendar month. The permittee shall also calculate and record the 12-month rolling time period SO2 emission rate, based upon the use of fuel oil, as determined at the end of each calendar month. **(R 336.1213(3))**
   f. Calculate and record the particulate emission rate, in tons emitted, for each calendar month. The permittee shall also calculate and record the 12-month rolling time period particulate emission rate, as determined at the end of each calendar month. **(R 336.1213(3))**
   g. Keep the following operational records for each calendar day:[2] **(40 CFR 60.49b(p))**
      i. Monitor and record the actual hours of operation.
      ii. Monitor and record the hourly steam load.

2. The permittee shall monitor and record the natural gas consumption rate, in MMCF, for each calendar day. The permittee shall also keep a summary record of the total natural gas usage rate, in MMCF, for each calendar month.[2] **(40 CFR 60.49b(d))**

3. The permittee shall calculate and record the NOx emission rate in pph and tons per calendar month. The permittee shall also calculate and record the 12-month rolling time period NOx rate, as determined at the end of each calendar month. These emission rates shall be derived from the average concentration of NOx emissions in ppm recorded by the CEM. **(R 336.1213(3))**

4. The permittee shall calculate and record the total gaseous non-methane organics emission rate, in pph emitted, for each calendar month. **(R 336.1213(3))**

5. When NOx emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75% of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.[2] **(40 CFR 60.48b(f))**

See Appendix 1.7

VII. REPORTING

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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

4. The permittee shall submit quarterly reports of the following: The reports are due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31. Each quarterly report shall include a summary of each of the following information **(40 CFR 60.49b)**:
   a. Monthly and 12-month rolling time period sulfur dioxide emissions due to the burning of oil, reported in tons emitted. **(40 CFR 60.49b(j))**
   b. Percent sulfur content of the fuel oil certifying that the fuel oil meets 0.44%. **(40 CFR 60.49b(r))**

5. The permittee shall submit a Quality Improvement Plan (QIP) if excess NOx emissions are observed twelve times in a 6-month reporting period. **(R 336.1213(3))**

6. For NOx, quarterly reporting for the CEMS, in the form of a Summary Report, containing an Excess Emission Summary and Continuous Monitoring Systems Performance Summary, if the total duration of the excess emissions for the quarter is less than 1% of the total operating time for the quarter and the total CEMS downtime for the quarter is less than 5% of the total operating time for the quarter, pursuant to Condition 26 of Part A. Due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31.[2] **(40 CFR Part 60 Subpart A 60.7)**

7. For NOx, quarterly reporting for the CEMS, containing the following: 1) A Summary Report, containing an Excess Emission Summary and Continuous Monitoring Systems Performance Summary, and 2) An Excess Emission Report and Continuous Monitoring Systems Out of Service Report, if the total duration of the excess emissions for the quarter is 1% or greater of the total operating time for the quarter or the total CEMS downtime for the quarter is 5% or greater of the total operating time for the quarter, pursuant to Condition 26 of Part A. Due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31.[2] **(40 CFR Part 60 Subpart A 60.7)**

8. For oxygen, quarterly reporting for the CEMS, in the form of a Continuous Monitoring System Performance Summary if the total CEMS downtime for the quarter is less than 5% of the total operating time for the quarter, and a Monitoring Systems Performance Summary and a Continuous Monitoring Systems Out of Service Report, if the total CEMS downtime for the quarter is 5% or greater of the total operating time for the quarter, pursuant to Condition 26 of Part A. Due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31.[2] **(40 CFR Part 60 Subpart A 60.7)**

9. Quarterly reporting for the CGAs conducted on the NOx and oxygen span gases in the form of a CGA Data Sheet. Due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31.[2] **(40 CFR Part 60 Appendix F)**

10. Reporting in the form of a summary report on the test results of the RATA conducted on the NOx and oxygen CEMS. Due 45 days after the quarter in which it is conducted.[2] **(40 CFR Part 60 Appendix F)**

11. For any required stack testing the permittee shall submit a test protocol to the AQD District Supervisor and the Technical Programs Unit at least 30 days prior to the scheduled test date. **(R 336.1213(3))**

12. The permittee shall notify the District Supervisor and the Technical Programs Unit no less than 7 days prior to the anticipated stack test date. **(R 336.2001(3))**

13. The permittee shall submit a complete stack test report of the test results to the District Supervisor and the Technical Programs Unit within 60 days following the last date of the test. **(R 336.2001(4))**

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBOILER#9	64.2[2]	115.0[2]	**R 336.1201(3)**

IX. OTHER REQUIREMENT(S)

1. The zero (or low-level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts of the NOx CEM shall be verified at least once each calendar day by the Data Acquisition and Handling System (DAHS). The zero and span shall, as a minimum, be adjusted whenever the 24-hour zero drift or 24-hour span drift exceeds two times the limits of the applicable performance specifications in 40 CFR Part 60 Appendix B. The system must allow the amount of excess zero and span drift measured at the 24-hour interval checks to be recorded and quantified, whenever specified. **(40 CFR 60.13(d)(1))**

2. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as follows: **(40 CFR 60.13(e))**

3. All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. **(40 CFR 60.13(e)(2))**

4. The permittee shall comply with the requirements of 40 CFR Part 60 Subparts A and Db. **(R 336.1213(3))**

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

EUK1MACHINE
EMISSION UNIT CONDITIONS

DESCRIPTION

K1 paperboard machine with in-line paperboard coating process. It includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, bar coater, ~~air knife~~ curtain coater, six drying ovens, starch preparation and handling equipment, and starch application equipment.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	41.4 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.3	**R 336.1225** **R 336.1702(a)**
2. Formaldehyde (CAS No. 50-00-0)	3,934.1 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
3. Acetaldehyde (CAS No. 75-07-0)	12, 841.4 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
4. Acetaldehyde (CAS No. 75-07-0)	39.8 lb/day[1]	Calendar Day	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.5	**R 336.1225**
5. Acrylonitrile (CAS No. 107-13-1)	58.9 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
6. Acrylamide (CAS No. 79-06-1)	240.0 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225(3)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC content of coating	0.5 lb/gal (minus water)* as applied[2]	Instantaneous	EUK1MACHINE	SC V.1 SC VI.2	**R 336.1702(a)**

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

2. The permittee shall not operate the starch cooker unless the water separator is operating properly.[2] **(R 336.1702(a))**

3. ~~The permittee shall not operate the air knife unless the Saveall Pan and mist eliminator are operating properly.[2] (R 336.1702(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. Upon request from the District Supervisor, the permittee shall verify the VOC content of any material by testing at owner's expense, in accordance with Department requirements. The test shall use a method approved by the District Supervisor as appropriate for the nature of the material to be tested. If the test results and the formulation values should differ, the permittee shall use the test results to determine compliance.[2] **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/ recordkeeping special condition.[2] **(R 336.1225, R 336.1702(a))**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each toxic air contaminant. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information on a calendar month basis for EUK1MACHINE:
   a. Pounds or tons of each VOC containing material used and reclaimed.
   b. VOC content (minus water and with water) of each material as applied/used.
   c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
   d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1702(a))**

4. The permittee shall keep the following information on a calendar month basis for EUK1MACHINE:
   a. Pounds or tons (with water) of each Formaldehyde (CAS No. 50-00-0), Acrylonitrile (CAS No. 107-13-1) and Acrylamide (CAS No. 79-06-1) containing material used and reclaimed.
   b. Formaldehyde (CAS No. 50-00-0), Acrylonitrile (CAS No. 107-13-1) and Acrylamide (CAS No. 79-06-1) content (with water) in pounds per gallon of each material used.
   c. Formaldehyde (CAS No. 50-00-0), Acrylonitrile (CAS No. 107-13-1) and Acrylamide (CAS No. 79-06-1) mass emission calculations determining the monthly emission rate in pounds per calendar month.

d. Formaldehyde (CAS No. 50-00-0), Acrylonitrile (CAS No. 107-13-1) and Acrylamide (CAS No. 79-06-1) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[1] **(R 336.1225)**

5. The permittee shall keep the following information on a calendar day basis for EUK1MACHINE:
   a. Pounds (with water) of Acetaldehyde (CAS No. 75-07-0) containing material used and reclaimed.
   b. The Acetaldehyde (CAS No. 75-07-0) content (with water) in pounds per gallon of each material used.
   c. Acetaldehyde (CAS No. 75-07-0) mass emission calculations determining the daily emission rate in pounds per calendar day.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[1] **(R 336.1225)**

6. The permittee shall calculate the mass emissions of Acetaldehyde (CAS No. 75-07-0), determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month for EUK1MACHINE. **(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. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal.[1] **(R 336.1225(4))**

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVD1	43.0 x 57.5[2]	52.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVD2	43.0 x 57.5[2]	52.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVD3	43.0 x 57.5[2]	51.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVOVEN1	36.0 x 32.0[2]	58.4[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVOVEN2	30.0 x 20.0[2]	58.4[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

NA

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

EUK3MACHINE
EMISSION UNIT CONDITIONS

DESCRIPTION

K3 paperboard machine with in-line paperboard coating process. It includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, a bar coater, an air-knife coater, drying ovens, starch preparation and handling equipment, and starch application equipment.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	20.8 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.3	**R 336.1225** **R 336.1702(a)**
2. Formaldehyde (CAS No. 50-00-0)	736.3 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
3. Acetaldehyde (CAS No. 75-07-0)	2,367.9 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
4. Acetaldehyde (CAS No. 75-07-0)	8.2 lb/day[1]	Calendar Day	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.5	**R 336.1225**
5. Acrylonitrile (CAS No. 107-13-1)	11.0 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC content of coating	0.5 lb/gal (minus water)* as applied[2]	Instantaneous	EUK3MACHINE	SC V.1 SC VI.2	**R 336.1702(a)**

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

2. The permittee shall not operate the air knife coater unless the Saveall Pan is operating properly.[2] **(R 336.1702(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. Upon request from the District Supervisor, the permittee shall verify the VOC content of any material by testing at owner's expense, in accordance with Department requirements. The test shall use a method approved by the District Supervisor as appropriate for the nature of the material to be tested. If the test results and the formulation values should differ, the permittee shall use the test results to determine compliance.[2] **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring / recordkeeping special condition.[2] **(R 336.1225, R 336.1702(a))**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each toxic air contaminant. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information on a calendar month basis for EUK3MACHINE:
   a. Pounds or tons of each VOC containing material used and reclaimed.
   b. VOC content (minus water and with water) of each material as applied/used.
   c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
   d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1225, R 336.1702(a))**

4. The permittee shall keep the following information on a calendar month basis for EUK3MACHINE:
   a. Pounds or tons (with water) of each Formaldehyde (CAS No. 50-00-0) and Acrylonitrile (CAS No. 107-13-1) containing material used and reclaimed.
   b. Formaldehyde (CAS No. 50-00-0) and Acrylonitrile (CAS No. 107-13-1) content (with water) in pounds per gallon of each material used.
   c. Formaldehyde (CAS No. 50-00-0) and Acrylonitrile (CAS No. 107-13-1) mass emission calculations determining the monthly emission rate in pounds per calendar month.
   d. Formaldehyde (CAS No. 50-00-0) and Acrylonitrile (CAS No. 107-13-1) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[1] **(R 336.1225)**

5. The permittee shall keep the following information on a calendar day basis for EUK3MACHINE:
   a. Pounds (with water) of Acetaldehyde (CAS No. 75-07-0) containing material used and reclaimed.
   b. The Acetaldehyde (CAS No. 75-07-0) content (with water) in pounds per gallon of each material used.
   c. Acetaldehyde (CAS No. 75-07-0) mass emission calculations determining the daily emission rate in pounds per calendar day.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[1] **(R 336.1225)**

6. The permittee shall calculate the mass emissions of Acetaldehyde (CAS No. 75-07-0), determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month for EUK3MACHINE. **(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. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal.[1] **(R 336.1225(4))**

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK3COATING	20.0[2]	51.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVK3WETEND1	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVK3WETEND2	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVK3DRYER1	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVK3DRYER2	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
6. SVK3DRYER3	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
7. SVK3DRYER4	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
8. SVK3DRYER5	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

NA

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

EUCONVERTDEPT
EMISSION UNIT CONDITIONS

DESCRIPTION

Off-line paperboard coater located in the converting department.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The volatile organic compound emission rate shall not exceed 2.9 pounds per gallon of coating, minus water, as applied.[2] **(R 336.1213(2)(d), R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a vendor certified formulation sheet for each coating, ink, and reducer on file. At a minimum, each certified formulation sheet shall show the chemical composition, VOC content and HAP content of the coating, ink, or reducer. Vendor formulation sheets shall be determined using Federal Reference Test Method 24 or 24A or an alternate test method that has been approved as acceptable by EPA and AQD. **(R 336.1213(3))**

2. The permittee shall monitor and record the volatile organic compound content, in pounds per gallon, minus water as applied, of each coating used. **(R 336.1213(3))**

See Appendix 1.4

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 1.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

EU01GASTANK
EMISSION UNIT CONDITIONS

DESCRIPTION

An existing stationary gasoline dispensing facility located at an area source of hazardous air pollutant that has a maximum monthly gasoline throughput of <10,000 gallons.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not allow gasoline to be handled in a manner that would result in a vapor release to the atmosphere for extended periods of time. **(40 CFR 63.11116(a))**

2. The permittee shall minimize gasoline spills. **(40 CFR 63.11116(a)(1))**

3. Spills shall be cleaned up as expeditiously as practicable. **(40 CFR 63/11116(a)(2))**

4. The permittee shall cover all open gasoline containers and all gasoline storage tank fill pipes with a gasketed seal when not in use. **(40 CFR 63.11116(a)(3))**
   a. Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F are considered acceptable for compliance with condition III.4.

5. Facilities are not required to submit notifications or reports, but must have gasoline throughput records available upon request by USEPA or MDEQ.

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 keep a record of gasoline throughput to be able to demonstrate that monthly throughput is less than 10,000 gallons and such record must be made available to USEPA or to MDEQ with 24 hours of a request. **(40 CFR 63.11116(b))**

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 applicable provisions of the Gasoline Distribution GACT as specified in 40 CFR Part 63, Subpart CCCCCC. **(40 CFR Part 63 Subpart CCCCCC)**

2. If the permittee's affected source's throughput ever exceeds an applicable throughput threshold, then permittee's affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold. **(40 CFR 63.11111(i))**

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGRULE290	Any emission unit that is exempt from Rule 201 pursuant to Rule 290.	EUCONVERTETHYLAC-ETATE EUMILLCYCLONES
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201, pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANERS
FG-RICE-MACT4Z	Each existing emergency stationary reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ, 63.6590(a)(1) and is exempt from the requirements of Rule 201 pursuant to Rules 282(b) or 285(g).	EUFIREPUMP

FG-RULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that is exempt from Rule 201 pursuant to Rule 290.

Emission Units: EUCONVERTETHYLACETATE, EUMILLCYCLONES

POLLUTION CONTROL EQUIPMENT

EUMILLCYCLONES - Cyclones

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(a)(i))**

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

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

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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 DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor **(R 336.1213(3))**:
   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
   d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
   e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information **(R 336.1213(3))**:
   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
   b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate**. (R 336.1213(3))**

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

VII. REPORTING

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGCOLDCLEANERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUCOLDCLEANERS

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(h))**
   b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**

2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
   a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**

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(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 1.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FG-RICE-MACT4Z
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each existing emergency stationary reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ, 63.6590(a)(1) and is exempt from the requirements of Rule 201 pursuant to Rules 282(b) or 285(g).

Compliance date – May 3, 2013, for CI Engines

Emission Unit: EUFIREPUMP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain any affected RICE, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**

2. The permittee shall operate each existing emergency stationary according to the requirements in paragraphs below:
   a. There is no time limit on the use of emergency stationary RICE in emergency situations. **(40 CFR 63.6640(f)(1))**
   b. The permittee may operate each emergency stationary RICE for a maximum of 100 hours per calendar year for any of the following purposes-:
      i. For maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, the regional transmission authority or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(i))**
   c. The permittee may operate each emergency stationary RICE up to 50 hours per year in non-emergency situations, but these 50 hours of operation are counted towards the 100 hours per calendar year operation provided for maintenance and testing SC III.2.b. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, 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. **(40 CFR 63.6640(f)(4))**

3. The permittee shall comply with the following requirements, for each existing emergency stationary RICE, by the applicable compliance date **(40 CFR 63.6603 and Table 2d)**:
   a. For CI engines:
      i. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.4.
      ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
      iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6603 and as listed in SC III.2. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i) for CI engines or i40 CFR 63.6625(j) for SI engines. **(40 CFR 63.6625(i) and (j))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each existing emergency stationary RICE with a non-resettable hour meter. **(40 CFR 63.6625(f))**

2. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop you own maintenance plan which must provide to the extent practicable for the maintenance and operation for the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a), Table 6)**

V. TESTING/SAMPLING

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

1. If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content. **(40 CFR 63.6625(i))**

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 63.6655 (except 63.6655(c)). **(40 CFR 63.6655(a))**

2. The permittee shall maintain, at a minimum, the following records by the applicable compliance date:
   a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart ZZZZ and the documentation supporting each notification and report. **(40 CFR 63.6655(a)(1))**
   b. Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(2))**
   c. Records of all required maintenance performed on the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(4))**
   d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**

3. The permittee shall keep records as required in SC IV.2 to show continuous compliance with each emission or operating limit that applies. **(40 CFR 63.6655(d), 63.6660)**

4. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

5. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document **(40 CFR 63.6655(f), 40 CFR 63.6660)**:
   a. How many hours are spent for emergency operation.
   b. What classified the operation as an emergency.
   c. How many hours are spent for non-emergency operation.

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 applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ as they apply to FG-RICE-MACT4Z. The permittee may choose an alternative compliance method not listed in FG-RICE-MACT4Z by complying with all applicable provisions required by Subpart ZZZZ for the compliance option chosen. **(40 CFR Part 70.6(9), 40 CFR Part 63.9(j), 40 CFR Part 63 Subparts A and ZZZZ)**

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

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 1.1. Abbreviations and Acronyms

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

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
GC	General Condition	psig	Pounds per square inch gauge
gr	Grains	PeTE	Permanent Total Enclosure
HAP	Hazardous Air Pollutant	PTI	Permit to Install
Hg	Mercury	RACT	Reasonable Available Control Technology
hr	Hour	ROP	Renewable Operating Permit
HP	Horsepower	SC	Special Condition
H_2S	Hydrogen Sulfide	scf	Standard cubic feet
HVLP	High Volume Low Pressure *	sec	Seconds
ID	Identification (Number)	SCR	Selective Catalytic Reduction
IRSL	Initial Risk Screening Level	SO_2	Sulfur Dioxide
ITSL	Initial Threshold Screening Level	SRN	State Registration Number
LAER	Lowest Achievable Emission Rate	TAC	Toxic Air Contaminant
lb	Pound	Temp	Temperature
m	Meter	THC	Total Hydrocarbons
MACT	Maximum Achievable Control Technology	tpy	Tons per year
MAERS	Michigan Air Emissions Reporting System	µg	Microgram
MAP	Malfunction Abatement Plan	VE	Visible Emissions
MDEQ	Michigan Department of Environmental Quality	VOC	Volatile Organic Compounds
mg	Milligram	yr	Year
mm	Millimeter		

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

Appendix 1.2. Schedule of Compliance

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

Appendix 1.3. Monitoring Requirements

Monitoring Requirements for EUBOILER#8:

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EUBOILER#8 when firing residual fuel oil (residual fuel oil means fuel oil grades no. 3 through no. 6) unless an alternative format is approved by the AQD District Supervisor:

1. The permittee shall perform and record the results of a six-minute visible emission check of SVBOILER#8 immediately after each start-up occurrence and at least once per calendar day thereafter during maximum routine operating conditions.

2. If visible emissions are observed at start-up or during maximum routine operating conditions, the permittee shall then perform and record the results of a six-minute visible emission check of SVBOILER#8 at least once every 30 minutes thereafter, until visible emissions are no longer observable or until visible emissions are observable for more than two hours.

3. If visible emissions are still observable within two hours of the initial observance, the permittee shall proceed with the Malfunction Abatement Plan in Appendix 1.9 and perform and record the results of a Federal Reference Test Method 9 visible emission observation of SVBOILER#8 within 24 hours; or the permittee shall cease firing of fuel oil and revert to firing natural gas until corrective action measures have been implemented.

4. If a Federal Reference Test Method 9 visible emission observation is performed and indicates a violation of the opacity standard specified in R 336.1301 (See General Condition 11), the permittee shall immediately notify the AQD as required in General Condition No. 21 of Part A.

5. If a Federal Reference Test Method 9 visible emission observation is performed and indicates that the opacity from EUBOILER#8 is in compliance with R 336.1301, then the permittee may continue to fire residual fuel oil and cease making visible emission checks until such time that residual fuel oil start-up occurs again.

NOTE: The purpose of the six-minute visible emission check is to verify (yes or no) whether visible emissions are observed. Therefore, the permittee should record a positive or negative response for each visible emission check that is performed.

Appendix 1.4. Recordkeeping

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

Appendix 1.5. Testing Procedures

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

Appendix 1.6. 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-B1678-2010. 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-B1678-2010b is being reissued as Source-Wide PTI No. MI-PTI-B1678-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
MI-PTI-B1678-2010b	NA	Facility-wide PTI.	Source-wide
99-11	201100148	Increase VOC emissions for EUK1Machine and EUK3MACHINE.	EUK1MACHINE EUK3MACHINE
99-11A	201300207	Add the use of new coating materials in EUK1MACHINE, which may emit acrylamide.	EUK1MACHINE EUK3MACHINE
NA	201400040	Move EUWEBPRESS#6 to Section 2 and removal of duplicate CAIR NO_x Budget Permit in Section 2.	EUWEBPRESS#6 CAIR NOx Budget Permit
82-14	NA	Modify the material limit options for the inks and coatings for the presses.	FGWEBPRESSES

Appendix 1.7. Emission Calculations

EUBOILER#9:

The permittee may use the following calculations and methods or an alternative method, as approved by the AQD District Supervisor, for determining the annual capacity factor as described for EUBOILER#9:

1. The Permittee shall record the total amount of each fuel consumed by EUBOILER#9 for each calendar day.

2. The permittee shall calculate the total amount of each fuel consumed by EUBOILER#9 for each calendar month.

3. For each fuel consumed, the permittee shall convert the fuel usage to an actual heat input value (MMBTU) for each calendar month by utilizing AP-42 emission factors. (i.e., for natural gas usage, (MCF x 1000 BTU/CF) / 1000 = MMBTU)

4. For each fuel consumed, the permittee shall calculate the 12-month rolling average annual capacity factor by dividing the 12-month average actual total heat input value (MMBTU) by the total heat input capacity of the boiler (226.7 million BTU/hr x 8760 hours for natural gas and 217.1 MMBTU/HR x 8760 hours for fuel oil).

The permittee may use the following calculations and methods or an alternative method, as approved by the district supervisor, for determining compliance with the emission limits the as described for EUBOILER#9.

1. The permittee shall calculate the 24-hour average pounds of NOx emitted per million BTUs of heat input for EUBOILER#9 by dividing the total of the hourly lb/MMBTU by 24 hours per day.

Appendix 1.8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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

Appendix 1.9 Malfunction Abatement Plan

Malfunction Abatement Plan for EUBOILER#8:

If the opacity exceeds the limits set forth in General Requirement 11, or if visible emissions are observed for more than two hours using the methods set forth in Appendix 1.3, the permittee shall implement the following procedures:

1. Determine the cause of the visible emissions within four hours of discovery.

2. Identify possible corrective measures within eight hours of discovery.

3. Implement the most practically feasible corrective measure which will reduce/eliminate the visible emissions within 48 hours of discovery.

4. Stop firing residual fuel oil and revert to firing natural gas until corrective action measures have been implemented.

Michigan Department Of Environmental Quality
Air Quality Division

CAIR Ozone Nitrogen Oxide Budget Permit
Permit No. MI-NOO-10698-2015

Permittee	Graphic Packaging International, Inc.
Address	1500 North Pitcher Street, Kalamazoo, Michigan
SRN	B1678
ORIS code	10698
Issue Date	April 15, 2015
Expiration	This permit shall expire when the Facility's ROP expires in accordance with Air Pollution Control Rule 336.1821.
ROP No.	MI-ROP-B1678-2015

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1803.

This permit incorporates automatically, upon recordation by the USEPA Administrator in accordance with Air Pollution Control Rule 336.1822, 336.1823, and 336.1834 every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx Budget unit(s) covered by the permit.

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
EUBOILER#8	X Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other

Permit Application:

CAIR Ozone NOX Season Permit application submitted August 5, 2014

Standard Requirements

(a) **Permit Requirements.**

(1) The CAIR designated representative of each CAIR NOX source required to have a Renewable Operating Permit (ROP) and each CAIR NOX unit required to have a ROP at the source shall:

(i) Submit to the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) a complete CAIR permit application under R 336.1821(3) in accordance with the deadlines specified in 40 CFR 97.321; and
(ii) Submit in a timely manner any supplemental information that the MDEQ-AQD determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NOX source required to have a ROP and each CAIR NOX unit required to have a ROP at the source shall have a CAIR permit issued by the MDEQ-AQD under subpart CCCC of 40 CFR part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

(b) **Monitoring, Reporting, and Recordkeeping Requirements.**

(1) The owners and operators, and the CAIR designated representative, of each CAIR NOX source and each CAIR NOX unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HHHH of 40 CFR part 97.

(2) The emissions measurements recorded and reported in accordance with subpart HHHH of 40 CFR part 97 shall be used to determine compliance by each CAIR NOX source with the CAIR NOX emissions limitation under paragraph (c) of this permit.

(c) **Nitrogen Oxides Emission Requirements.**

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NOX source and each CAIR NOX unit at the source shall hold, in the source's compliance account, CAIR NOX allowances available for compliance deductions for the control period under 40 CFR 97.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NOX units at the source, as determined in accordance with subpart HHHH of 40 CFR part 97.

(2) A CAIR NOX unit shall be subject to the requirements under paragraph (c)(1) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.370(b)(1), (2), (3) or (7) and for each control period thereafter.

(3) A CAIR NOX allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this permit, for a control period in a calendar year before the year for which the CAIR NOX allowance was allocated.

(4) CAIR NOX allowances shall be held in, deducted from, or transferred into or among CAIR NOX Allowance Tracking System accounts in accordance with subparts EEEE, FFFF, GGGG, or IIII of 40 CFR part 97.

(5) A CAIR Ozone NOX Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR Ozone NOX Season Trading Program. No provision of the CAIR Ozone NOX Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.305 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR NOX allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of 40 CFR part 97, every allocation, transfer, or deduction of a CAIR NOX allowance to or from a CAIR NOX source's compliance account is incorporated automatically in any CAIR permit of the source.

~~(d) **Excess Emissions Requirements.**~~

~~If a CAIR NOX source emits nitrogen oxides during any control period in excess of the CAIR NOX emissions limitation, then:~~

~~(1) The owners and operators of the source and each CAIR NOX unit at the source shall surrender the CAIR NOX allowances required for deduction under 40 CFR 97.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and~~

~~(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, the Clean Air Act, and applicable State rules.~~

~~(e) **Recordkeeping and Reporting Requirements.**~~

~~(1) Unless otherwise provided, the owners and operators of the CAIR NOX source and each CAIR NOX unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the MDEQ-AQD or the Administrator.~~

> ~~(i) The certificate of representation under § 97.313 for the CAIR designated representative for the source and each CAIR NOX unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.313 changing the CAIR designated representative.~~
> ~~(ii) All emissions monitoring information, in accordance with subpart HHHH of 40 CFR part 97.~~
> ~~(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NOX Ozone Trading Program.~~
> ~~(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NOX Ozone Trading Program or to demonstrate compliance with the requirements of the CAIR NOX Ozone Trading Program.~~

~~(2) The CAIR designated representative of a CAIR NOX source and each CAIR NOX unit at the source shall submit the reports required under the CAIR NOX Ozone Trading Program, including those under subpart HHHH of 40 CFR part 97.~~

~~(f) **Liability.**~~

~~(1) Each CAIR NOX source and each CAIR NOX unit shall meet the requirements of the CAIR NOX Ozone Trading Program.~~

~~(2) Any provision of the CAIR NOX Ozone Trading Program that applies to a CAIR NOX source or the CAIR designated representative of a CAIR NOX source shall also apply to the owners and operators of such source and of the CAIR NOX units at the source.~~

~~(3) Any provision of the CAIR NOX Ozone Trading Program that applies to a CAIR NOX unit or the CAIR designated representative of a CAIR NOX unit shall also apply to the owners and operators of such unit.~~

~~(g) **Effect on Other Authorities.**~~

~~No provision of the CAIR NOX Ozone Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NOX source or CAIR NOX unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.~~

SECTION 2 - CARTON PLANT

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), R336.1214a(5))**

- Those conditions that are hereby incorporated in 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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
    b. A limit specified by an applicable federal new source performance standard.

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

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

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).[2] **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.

c. The company or entity that performed the analyses of the samples.
d. The analytical techniques or methods used.
e. The results of the analyses.
f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP **(R 336.1213(3)(c))**:
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
    a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
    b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete”. The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

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

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

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
    d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not

expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.

37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original

equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. [2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. [2] **(R 336.1201(8) Section 5510 of Act 451)**

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDNRE. [2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. [2] **(R 336.1201(4))**

Footnotes:

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. The stationary source-wide, Section 1 and Section 2 combined, emission rate of an individual HAP shall be less than 9.9 tons per 12-month rolling time period. **(R 336.1213(2))**

2. The stationary source-wide, Section 1 and Section 2 combined, emission rate of total combined HAPs shall be less than 24.9 tons per 12-month rolling time period. **(R 336.1213(2))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall calculate and record the stationary source-wide, Section 1 and Section 2 combined, emission rates, in tons, for each single HAP and total combined HAPs for each calendar month and each 12-month rolling time period, as determined at the end of each calendar month. **(R 336.1213(3))**

See Appendix 2.4

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 2.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). **(R 336.1213(4)(c))**

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWEBPRESS#1	Ultraviolet cured web offset lithographic printing press with in-line flexographic single roller coater and video jet printer.	01-01-89 08-28-14	FGWEBPRESSES
EUWEBPRESS#2	Ultraviolet cured web offset lithographic printing press with in-line flexographic single roller coater and video jet printer.	01-01-89 08-28-14	FGWEBPRESSES
EUWEBPRESS#3	Ultraviolet cured web offset lithographic printing press with in-line flexographic single roller coater and video jet printer.	01-01-89 08-28-14	FGWEBPRESSES
EUWEBPRESS#4	An 8-color 42 inch web litho (offset) printing process. The coatings applied on the press will be cured in a Flexo dryer. The process also includes an ultraviolet dryer to cure ultraviolet inks.	08-29-08 08-28-14	FGWEBPRESSES
EUWEBPRESS#5	An 8-color 42 inch web litho (offset) printing process. The coatings applied on the press will be cured in a Flexo dryer.	08-29-08 08-28-14	FGWEBPRESSES
EUWEBPRESS#6	One ultraviolet cured web offset lithographic printing press with in-line flexographic single roller coater.	10-05-11 08-28-14	FGWEBPRESSES
EUGLUER#1	Gluer used to apply adhesive.	01-01-89 NA	FGR290
EUGLUER#2	Gluer used to apply adhesive.	01-01-89 NA	FGR290
EUGLUER#3	Gluer used to apply adhesive.	09-01-09 NA	FGR290
EUGLUER#4	Gluer used to apply adhesive.	09-01-09 NA	FGR290
EUGLUER#5	Gluer used to apply adhesive.	09-01-09 NA	FGR290
EUGLUER#6	Gluer used to apply adhesive.	01-01-10 NA	FGR290
EUGLUER#7	Gluer used to apply adhesive.	05-01-12 NA	FGR290
EUGLUER#8	Gluer used to apply adhesive.	02/01/2019	FGR290
EUSILICONE	Application of food-grade silicone to palletizer tables	11/2012	FGR290

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCARTON290ETHAC	Ethyl acetate used in the carton plant to clean.	01-01-89 NA	FGR290
EUCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201, pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	<07-01-79 >07-01-79	FGCOLDCLEANERS

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGWEBPRESSES	Six heatset, webfed offset lithographic printing presses with in-line flexographic single roller coaters and video jet printers; ultraviolet cured. All of the presses are manual wash.	EUWEBPRESS#1 EUWEBPRESS#2 EUWEBPRESS#3 EUWEBPRESS#4 EUWEBPRESS#5 EUWEBPRESS#6
FGRULE290	Any emission unit that is exempt from Rule 201 pursuant to Rule 290.	EUGLUER#1 EUGLUER#2 EUGLUER#3 EUGLUER#4 EUGLUER#5 EUGLUER#6 EUGLUER#7 EUGLUER#8 EUCARTON290ETHAC EUSILICONE
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201, pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANERS

FGWEBPRESSES
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Six heatset, webfed, offset lithographic printing presses with in-line flexographic single roller coaters and video jet printers; ultraviolet cured. All of the presses are manual wash.

Emission Units: EUWEBPRESS#1, EUWEBPRESS#2, EUWEBPRESS#3, EUWEBPRESS#4, EUWEBPRESS#5, EUWEBPRESS#6

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	9.9 pph[2]	Test protocol	EUWEBPRESS#1, EUWEBPRESS#2, EUWEBPRESS#3 combined	SC VI.1, 2, and 4	**R 336.1702(a)**
2. VOC	41.8 tons per year[2]	Per 12 month rolling time period as determined at the end of each calendar month	EUWEBPRESS#1, EUWEBPRESS#2, EUWEBPRESS#3 combined	SC VI.1, 2, and 4	**R 336.1225 R 336.1702(a)**
3. VOC	26.0 tons per year[2]	Per 12 month rolling time period as determined at the end of each calendar month	EUWEBPRESS#4, EUWEBPRESS#5 combined	SC VI.1, 2, and 4	**R 336.1225 R 336.1702(a)**
4. VOC	13.5 tons per year[2]	Per 12 month rolling time period as determined at the end of each calendar month	EUWEBPRESS#6	SC VI.1, 2, and 4	**R 336.1225 R 336.1702(a)**

*Test protocol shall specify averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC content of the fountain solution	5.0% by weight, as applied and no alcohol*[2]	Instantaneous	Each press in FGWEBPRESSES	SC VI.1, 2, and 5	**R 336.1702(a)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
2. VOC content of the inks and coatings	25%, by volume, of the total volatile fraction, as applied, Or, the non-volatile fraction must be > 60% by volume of coating or ink, minus water and exempt solvents, as applied[2]	Instantaneous	Each press in FGWEBPRESSES	SC VI.1, 2, and 6	**R 336.1702(a)**

*No alcohol includes isopropyl alcohol (CAS #67-63-0), propyl alcohol (CAS #71-23-8), and ethanol (CAS #64-17-5)

3. All printing press-related cleaning solvents shall have VOC composite partial vapor pressures that do not exceed 10 mmHg @ 20°C (68°F).[2] **(R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All VOC containing inks, fountain solution, coatings, cleaning solvents such as blanket and roller washes, unused shop towels, etc. (materials) shall be store in closed containers and disposed of in an acceptable manner, in compliance with all applicable state rules and federal regulations.[2] **(R 336.1224, R 336.1225, R 336.1702(a))**

2. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.[2] **(R 336.1224, R 336.1225, R 336.1702(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 verify the VOC content of any ink, coating, etc. (material), as received and as applied, using federal Reference Test Method 24 or 24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, VOC content may be determined from manufacturer's formulation data. If the Method 24 or 24A and the formulation values should differ, the method 24 or 24A results shall be used to determine compliance.[2] **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1225, R 336.1702(a))**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1225, R 336.1702)**

3. The permittee shall record the usage rate of each VOC containing material in VI.3, for each calendar month. **(R 336.1213(3))**

4. The permittee shall the following information on a calendar month basis for FGWEBPRESSES:
   a. The type of each VOC containing material used and reclaimed (ink, coating, fountain solution, blanket wash, press wash, roller wash, etc.).
   b. The VOC content of each material as received and as applied (in percent by weight or pounds per gallon).
   c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used or an alternate factor approved by the AQD District Supervisor.)
   d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used or an alternate factor approved by the AQD District Supervisor.)

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1702(a))**

5. The permittee shall calculate the VOC content of the fountain solution using the method detailed in Appendices 2.4 and 2.7 or an alternate method approved by the AQD District Supervisor. Calculations shall include both dampening aid and wetting agent, as used, in percent by weight. The permittee shall keep all records on file at the facility and make them available to the Department upon request.[2] **(R 336.1702(a))**

6. The permittee shall keep a written record, for each press, of VOC emission calculations determining the volume of VOCs in the inks and coatings, as a percentage of the total volatile fraction, including water; or the non-volatile volume faction of the inks and coatings as a percent of the ink or coating total volume, minus water, based upon an instantaneous basis. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. Calculations shall include both dampening aid and wetting agent, as used, in percent by weight. The permittee shall keep all records on file at the facility and make them available to the Department upon request.[2] **(R 336.1702(a))**

See Appendices 2.4 and 2.7

VII. REPORTING

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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

See Appendix 2.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWEBPRESSES (for EUWEBPRESS#1, #2, and #3)	20.4[2]	62.9[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVWEBPRESS#4	12[2]	65[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVWEBPRESS#5	12[2]	65[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVWEBPRESS#6-A	14[2]	29[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVWEBPRESS#6-B	14[2]	29[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

NA

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

FGRULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units: EUGLUER#1, EUGLUER#2, EUGLUER#3, EUGLUER#4, EUGLUER#5, EUGLUER#6, EUGLUER#7, EUGLUER#8, EUCARTON290ETHAC, EUSILICONE, and any other Rule 201 exempt emission unit pursuant to Rule 290.

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(a)(i))**

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

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

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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 DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor **(R 336.1213(3))**:
   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
   d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
   e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information **(R 336.1213(3))**:
   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
   b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate**. (R 336.1213(3))**

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

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 2.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGCOLDCLEANERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUCOLDCLEANERS

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(h))**
   b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**

2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
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(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 2.1. Abbreviations and Acronyms

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

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
GC	General Condition	psig	Pounds per square inch gauge
gr	Grains	PeTE	Permanent Total Enclosure
HAP	Hazardous Air Pollutant	PTI	Permit to Install
Hg	Mercury	RACT	Reasonable Available Control Technology
hr	Hour	ROP	Renewable Operating Permit
HP	Horsepower	SC	Special Condition
H_2S	Hydrogen Sulfide	scf	Standard cubic feet
HVLP	High Volume Low Pressure *	sec	Seconds
ID	Identification (Number)	SCR	Selective Catalytic Reduction
IRSL	Initial Risk Screening Level	SO_2	Sulfur Dioxide
ITSL	Initial Threshold Screening Level	SRN	State Registration Number
LAER	Lowest Achievable Emission Rate	TAC	Toxic Air Contaminant
lb	Pound	Temp	Temperature
m	Meter	THC	Total Hydrocarbons
MACT	Maximum Achievable Control Technology	tpy	Tons per year
MAERS	Michigan Air Emissions Reporting System	µg	Microgram
MAP	Malfunction Abatement Plan	VE	Visible Emissions
MDEQ	Michigan Department of Environmental Quality	VOC	Volatile Organic Compounds
mg	Milligram	yr	Year
mm	Millimeter		

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

Appendix 2.2. Schedule of Compliance

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

Appendix 2.3. Monitoring Requirements

There are no specific monitoring requirements for this ROP. Therefore, this appendix is not applicable.

Appendix 2.4. Recordkeeping

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

Weight Percent of VOC* in Fountain Solution

Month/Year: _____

		A	B	C	D	E[1]
Date	**Material ID**	**Gallons used, as received**	**Density (#/gal)**	**VOC Content, as received (wt%)**	**Water Used (gallons)**	**VOC Content, as applied (wt%)**

*Includes both dampening aid and wetting agent.
[1]See Appendix 2.7 for calculation.

Appendix 2.5. Testing Procedures

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

Appendix 2.6. 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-B1678-2010. 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-B1678-2010b is being reissued as Source-Wide PTI No. MI-PTI-B1678-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
MI-PTI-B1678-2010b	NA	Facility-wide PTI.	Source-wide
82-14	NA	Changed the material limits for the presses so that they are equivalent and can be combined into one flex group table.	FGWEBPRESSES
NA	201400040	Make corrections to the ROP by moving EUWEBPRESS#6 from Section 1 to Section 2; delete CAIR O_3	EUWEBPRESS#6

		and NOx Budget Permits from Section 2.	

Appendix 2.7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGWEBPRESSES. Alternative formats must be approved by the AQD district Supervisor.

To calculate the VOC weight percent for the table in appendix 2.4 above, use the following equation:

$$E = \frac{(A \times B \times C/100) \times 100}{(A \times B) + (D \times 8.34)}$$ (For C, if 9% use 9 not 0.09)

Appendix 2.8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

	SRN: B1678	Section Number (if applicable): 1

1. Additional Information ID
AI-PartC_Sec1

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

C9. Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement?

Yes – The malfunction abatement plan for EUBOILER#8 when burning fuel oil is included in the ROP as Appendix 1.9. See AI-Mark-Up.

RENEWABLE OPERATING PERMIT
RENEWAL APPLICATION FORM

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

GENERAL INSTRUCTIONS

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

PART A: GENERAL INFORMATION

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

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
B1678	2657	322212	MI-ROP-B1678-2015	2

Source Name
Graphic Packaging International, LLC

Street Address
1500 North Pitcher Street

City	State	ZIP Code	County
Kalamazoo	MI	49007	Kalamazoo

Section/Town/Range (if address not available)

Source Description
The carton plant facility operates six lithographic web press lines. Each of the lithographic web press lines also include an in-line flexographic coater.

☐ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
Graphic Packaging International, LLC	2

Mailing address (☐ check if same as source address)
1500 Riveredge Parkway Suite 100

City	State	ZIP Code	County	Country
Atlanta	GA	30328	Fulton	USA

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

SRN: B1678	Section Number (if applicable): 2

PART A: GENERAL INFORMATION (continued)

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

CONTACT INFORMATION

Contact 1 Name			Title	
Spencer Macko			EHS Manager	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
269.383.5319		Spencer.Macko@graphicpkg.com		

Contact 2 Name (optional)			Title	
Susan Kuieck, PE			Consultant	
Company Name & Mailing address (☐ check if same as source address)				
FTCH, 1515 Arboretum Drive SE				
City	State	ZIP Code	County	Country
Grand Rapids	MI	49546	Kent	USA
Phone number		E-mail address		
616.464.3721		slkuieck@ftch.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name			Title	
Kevin Franks			Director, Web Operations	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
269.383.5443		kevin.franks@graphicpkg.com		

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

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

SRN: B1678	Section Number (if applicable): 2

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

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

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

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

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

Kevin Franks, Director, Web Operations

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

K-LF for

Signature of Responsible Official

4·10·19

Date

PART C: SOURCE REQUIREMENT INFORMATION

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

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☒ Yes ☐ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☒ No ☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☒ Yes ☐ No
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☐ Yes ☒ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No ☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to the MDEQ, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	☐ Yes ☒ No ☐ Yes ☒ No ☐ ☐
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☐ Yes ☒ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☐ Yes ☒ No

☒ Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-** AI-PartC_Sec2

SRN: B1678	Section Number (if applicable): 2

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

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

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☒ Yes ☐ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]
EU02ROOFUNITS	Rooftop heating units	Rule 212(4)(c)	Rule 282(b)(i)
EUCARTONBAGHOUSE	Carton baghouse	Rule 212(4)(e)	Rule 285(l)(vi)(c)

Comments:

Exempt equipment predates the December 2016 rule revisions; therefore, historical exemption rule references consistent with the previous ROP renewal application have been used.

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

SRN: B1678	Section Number (if applicable): 2

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☐ Yes ☒ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No

Comments:
E2: Note that SVWEBPRESSES in ROP is referred to as SVFLEX01 in MAERS.

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

SRN: B1678	Section Number (if applicable): 2

PART F: PERMIT TO INSTALL (PTI) INFORMATION

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

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

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

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

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

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

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

Comments:

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

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

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

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.

If Yes, identify the emission units in the table below. If No, go to Part H. ☒ Yes ☐ No

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

Origin of Applicable Requirements	**Emission Unit Description – *Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices***	**Date Emission Unit was Installed/ Modified/ Reconstructed**
☐ Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
☐ Rule 287(2)(c) surface coating line		
☒ Rule 290 process with limited emissions	EUSILICONE - Application of food-grade silicone to palletizer tables EUGLUER#8 - Gluer used to apply adhesive.	11/2012 03/2018

Comments:

MAERS forms have been included for EUSILICONE. See AI-PartC_Sec2. EUSILICONE has been added to the red-lined version of the ROP. See AI-Mark-Up in S.

Emissions from EUGLUER#8 started operation in 2018 and will be reported with the total for the other gluers.

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

SRN: B1678	Section Number (if applicable): 2

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

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

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

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

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

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

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

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

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

	SRN: B1678	Section Number (if applicable): 2

1. Additional Information ID
AI-

Additional Information

2. Is This Information Confidential? ☐ Yes ☐ No

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

	SRN: B1678	Section Number (if applicable): 2

1. Additional Information ID
AI-PartC_Sec2

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

C4. Has this stationary source added or modified equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO2, VOC, lead) emissions?

Yes – EUGLUER#8 and EUSILICONE were added since the last ROP renewal. These emission units are exempt from permitting requirements pursuant to Rule 290. Therefore, the potential to emit from each is 1,000 pounds per month of VOCs or 6 tpy.

Graphic Packaging
INTERNATIONAL

1500 N Pitcher St
Kalamazoo, MI 49009

January 28, 2022

Rex Lane
EGLE-AQD
7953 Adobe Road

Kalamazoo, MI 49009-5025

RE: M-001 Modification request
ROP-MI-B1678- 2015
PTI #133-19A

Enclosed the modification request to incorporate PTI #133-19A in ROP-MI-B1678-2015 for Graphic Packaging Kalamazoo Mill and an associated documentation report certification form as requested.

If you have any questions, or require additional information, please contact me at 269-383-5453.

Sincerely,

Steven Smock
Environmental Manager
Steven.Smock@graphicpkg.com

Graphic Packaging International, LLC.

EGLE Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION
C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.

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

Form Type **C-001**	SRN B1678

Stationary Source Name Graphic Packaging International	
City Kalamazoo	County Kalamazoo

SUBMITTAL CERTIFICATION INFORMATION

1. Type of Submittal *Check only one box.*

☐ Initial Application (Rule 210) ☒ Notification / Administrative Amendment / Modification (Rules 215/216)

☒ Renewal (Rule 210) ☐ Other, describe on AI-001

2. If this ROP has more than one Section, list the Section(s) that this Certification applies to _____

3. Submittal Media ☒ E-mail ☐ FTP ☐ Disk ☒ Paper

4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.

AI

CONTACT INFORMATION

Contact Name Steven Smock	Title Environmental Manager
Phone number 269.383.5453	E-mail address steven.smock@graphicpkg.com

This form must be signed and dated by a Responsible Official.

Responsible Official Name Tom Olstad			Title Mill Manager	
Mailing address 1500 North Pitcher Street				
City Kalamazoo	State MI	ZIP Code 49007	County Kalamazoo	Country US

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

Signature of Responsible Official

1/28/2022
Date

EGLE

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division

RENEWABLE OPERATING PERMIT
M-001: RULE 215 CHANGE NOTIFICATION
RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN B1678	2. ROP Number MI-ROP-B1678_2015	3. County Kalamazoo
4. Stationary Source Name	Graphic Packaging International	
5. Location Address	1500 North Pitcher Street	6. City Kalamazoo

7. Submittal Type - *The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.*

- ☐ **Rule 215(1) Notification of change**. *Complete Items 8 – 10 and 14*
- ☐ **Rule 215(2) Notification of change**. *Complete Items 8 – 10 and 14*
- ☐ **Rule 215(3) Notification of change**. *Complete Items 8 – 11 and 14*
- ☐ **Rule 215(5) Notification of change**. *Complete Items 8 – 10 and 14*
- ☐ **Rule 216(1)(a)(i)-(iv) Administrative Amendment**. *Complete Items 8 – 10 and 14*
- ☒ **Rule 216(1)(a)(v) Administrative Amendment**. *Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.*
- ☐ **Rule 216(2) Minor Modification**. *Complete Items 8 – 12 and 14*
- ☐ **Rule 216(3) Significant Modification**. *Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.*
- ☐ **Rule 216(4) State-Only Modification**. *Complete Items 8 – 12 and 14*

8. Effective date of the change. (MM/DD/YYYY) *See detailed instructions.* 05/01/2022?

9. Change in emissions? ☒ Yes ☐ No

10. Description of Change - *Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).*

Incorporation of PTI 133-19A

11. New Source Review Permit(s) to Install (PTI) associated with this application? ☒ Yes ☐ No

If Yes, enter the PTI Number(s) 133-19A ____-____ ____-____ ____-____ ____-____

12. Compliance Status - *A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.*

a. Is the change identified above in compliance with the associated applicable requirement(s)? ☒ Yes ☐ No

b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? ☒ Yes ☐ No

c. If the change includes a future applicable requirement(s), will timely compliance be achieved? ☒ Yes ☐ No

13. Operator's Additional Information ID - *Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.* **AI PTI 133-19A**

14. Contact Name	Telephone No.	E-mail Address
Steven Smock	269.383.5453	steven.smock@graphicpkg.com

15. This submittal also updates the ROP renewal application submitted on 04/26/2019 ☒ Yes ☐ N/A
(If yes, a mark-up of the affected pages of the ROP must be attached.)

NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: B1678	Section Number (if applicable): 1

1. Additional Information ID
AI-PTI 133-19A

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

This submittal is in response to a request from EGLE. The attached technical memo prepared by Fishbeck describes the proposed changes. Also attached with the memo is a copy of PTI No. 133-19A and a redline of the ROP containing the proposed changes.

GPI believes that incorporation of PTI No. 133-19A is subject to Rule 216(1)(a)(v), and therefore due following completion of the testing and monitoring required by the permit, but no later than 12 months following completion of the project. GPI has not completed aspects of the project, including the K2 expansion, but provides this update at the request of AQD (i.e., despite the lack of installation or operation of certain equipment).

fishbeck
Engineers | Architects | Scientists | Constructors

39500 MacKenzie Drive, Suite 100
Novi, Michigan 48377

248.324.2090 | fishbeck.com

Technical Memo

SUBJECT: Renewable Operating Permit (ROP) Modification – Graphic Packaging International, LLC

DATE: January 28, 2022 **PROJECT NO.:** 220033

Table of Contents

Introduction

Graphic Packaging International, LLC (GPI) received Permit to Install (PTI) 133-19A for modifications to the recently permitted, but not yet completely installed, recycled paperboard machine project. The permitted changes include:

- Installation of two natural gas boilers (311 million Btus per hour [MMBtu/hr] each).
- Construction of a new coated recycled paperboard machine and associated equipment.
- Introduction of a limit in annual natural gas usage for Boiler 8 as well as elimination of fuel oil in Boiler 9.
- Installation of a new utility cooling tower.

Because PTI 133-19A went through a public comment period, the requirements of the permit would typically be incorporated into the Renewable Operating Permit (ROP) as an *administrative amendment* under Rule 216(a)(v). This type of administrative amendment to incorporate the permit should be submitted upon completion of all testing, monitoring, and record keeping required by the permit, but not later than 12 months after the date the modified source commences operation under the new PTI. GPI has not completed the installation of all of the equipment included in PTI 133-19A and has not completed any of the testing detailed in the permit. The boilers referred to as EUBOILER#10 and EUBOILER#11 in the PTI have been installed and are operating at reduced capacity. A majority of the equipment to be installed as part of this modification is not yet operational.

Under normal circumstances, ROP-subject facilities would wait until all the equipment was installed and operating with any initial testing completed before modifying the ROP. GPI has not completed aspects of the project, including the K2 expansion, but provides this update at the request of the AQD (i.e., despite the lack of installation or operation of certain equipment). Typically, an update to the ROP Renewal Application would not be prepared this early in the construction of the equipment, as the new PTI includes applicable requirements to which the facility is not yet subject. This presents some interesting challenges in writing the ROP, as final equipment descriptions and information for the various plans are not yet available either. Fishbeck has been contracted by GPI to propose ROP

language that reflects the current state of the equipment and will not require additional modifications once the equipment is up and running.

Current Equipment Status

An ROP is an operating permit which is used to compile applicable requirements for the equipment operating at the facility. Because the equipment is not yet installed at the time a PTI is issued, the ROP program allows up to 12 months after equipment begins operation to apply for an ROP modification, which would incorporate the new applicable requirements. The status of the various equipment referenced in PTI 133-19A is provided below.

Emission Units or Flexible Group PTI Designation	Description	Status (installed, started, incomplete, completed, conducting testing, operating, etc.)
EUAMU	Natural gas-fired air makeup units (AMU) with a combined heat capacity of 106.5 MMBtu/hr	Some AMU installed – construction incomplete
EUBOILER#10	Natural gas-fired boiler rated at 311 MMBtu/hr	Startup complete, not operating at maximum capacity as K2 steam line is not operational
EUBOILER#11	Natural gas-fired boiler rated at 311 MMBtu/hr	Startup complete, not operating at maximum capacity as K2 steam line is not operational
EUCOOLINGTW1	Utility cooling tower- 6,227 gallon per minute water flowrate	Undergoing construction
EUCALENDARHEAT1	2.8 MMBtu/hr natural gas fired Precoat Calendar Heater	Undergoing construction
EUCALENDARHEAT2	2.8 MMBtu/hr natural gas fired Precoat Calendar Heater	Undergoing construction
EUDRYER1	27.6 MMBtu/hr natural gas fired Air Impingement Dryer - Predryer section of the paperboard machine.	Undergoing construction
EUDRYER2	6.1 MMBtu/hr natural gas fired High Intensity Air Dryer after first Coater in the paperboard machine.	Undergoing construction
EUDRYER3	7.6 MMBtu/hr natural gas fired Air Dryer after first Coater of the paperboard machine	Undergoing construction
EUDRYER4	7.5 MMBtu/hr Infrared Dryer after second Coater of the paperboard machine.	Undergoing construction
EUDRYER5	7.6 MMBtu/hr natural gas fired Air Dryer after second Coater of the paperboard machine.	Undergoing construction
EUDRYER6	7.6 MMBtu/hr natural gas fired Air Dryer after second Coater of the paperboard machine.	Undergoing construction
EUDRYER7	7.6 MMBtu/hr natural gas fired Air Dryer after second Coater of the paperboard machine.	Undergoing construction
EUSTARCH	Starch silo, starch handling and application equipment	Undergoing construction
K2 machine	Paperboard machine with in-line paperboard coating process	Undergoing construction

The PTI requires that a startup notification be completed for several emission units after the equipment has been installed and begins operating. GPI has only submitted the notification for the two new boilers, EUBOILER#10 and EUBOILER#11. Special Condition VII.1 in EUSTARCH requires that GPI notify EGLE after completion of the installation of EUSTARCH. In addition, Rule 216(a)(v)(A) requires that GPI provide notice within 30 days of completion of the installation for the remainder of the emission units listed in PTI 133-19A. As other equipment is placed in service, additional notifications will be made.

Current Applicable Requirements

As mentioned above, the emission units included in FGBOILERS10-11 in PTI 133-19A have been installed and are operational. GPI has provided notice of startup for the boilers and performed the Relative Accuracy Test Audit (RATA) to certify the continuous emission monitoring system (CEMS) associated with the boilers. In addition to requirements for FGBOILERS10-11, PTI 133-19A included modified requirements for EUBOILER#8 and EUBOILER#9 once the new boilers were up and running. Since these requirements are currently applicable, Fishbeck has updated the redline of the ROP submitted with the ROP Renewal Application to incorporate the new applicable requirements.

In addition to the boilers, some of the natural gas air makeup units (EUAMU) identified in PTI 133-19A are operating and the conditions are included in the updated redline of the ROP.

Future Applicable Requirements

As mentioned above, a majority of the emission units included in PTI 133-19A are not fully operational. The notices have not been submitted because GPI has not completed installation of these emission units. Therefore, the requirements in PTI 133-19A associated with the other equipment would be considered future applicable requirements at this time. These requirements have been incorporated into the redline of the ROP indicating that they apply upon completion of construction and commencement of operation of the applicable emission units. In addition to the requirements associated with the new equipment, PTI 133-19A includes a requirement that EUBOILER#7 be shut down by May 1, 2022. Fishbeck has included this change in the redline, assuming this will be applicable when the ROP is finalized. Fishbeck has provided suggested language which explains that the requirements in several sections of the ROP mark-up will not go into effect immediately, but rather after the necessary milestone for installation or operation has been reached.

CAM Applicability

An emission unit that uses an add-on control device to achieve compliance with an emission standard; has pre-control emissions over 100% of the major source threshold; and is subject to an emission limitation or standard; must develop and implement compliance assurance monitoring (CAM). Emission units requiring a CAM Plan must include a CAM Plan with the renewal application. As most of the equipment permitted under PTI 133-19A does not utilize add-on control equipment, no CAM Plans are included in this application. While the two new boilers, Boilers 10 and 11, operate low nitrogen oxides (NO_X) burners and flue gas desulfurization, neither of these control technologies is considered add-on control equipment; as a result, the two new boilers are not subject to CAM. EUSTARCH has a bin vent filter as add on control, however, it does not have the potential to emit greater than 100 tons per year of particulate, even if the bin vent filter is not operating properly. Therefore, EUSTARCH is not subject to CAM. The cooling tower, EUCOOLINGTW1, is equipped with drift eliminators, which are considered an integral part of the equipment and not add-on control equipment. The cooling tower is not subject to CAM either.

Attachments

Attachment 1 PTI 133-19A
Attachment 2 Updated ROP Redline with new Requirements

Abbreviations/Acronyms

CAM compliance assurance monitoring
CFR Code of Federal Regulations
EGLE Michigan Department of Environment, Great Lakes, and Energy

GPI	Graphic Packaging International, LLC
NO_X	nitrogen oxides
PTI	Permit to Install
ROP	Renewable Operating Permit

Attachment 1

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

November 24, 2020

PERMIT TO INSTALL
133-19A

ISSUED TO
Graphic Packaging International, LLC

LOCATED AT
1810 North Pitcher Street
Kalamazoo, Michigan 49007

IN THE COUNTY OF
Kalamazoo

STATE REGISTRATION NUMBER
B1678

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **August 17, 2020**	
DATE PERMIT TO INSTALL APPROVED: **November 24, 2020**	SIGNATURE: Mary Ann Dolehanty
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS

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

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

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

GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUK2MACHINE	Material handling process including dry and wet end process, steam heated drying cylinders, coating preparation and handling equipment, curtain coater of the paperboard machine and associated natural gas fired dryers.	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUBOILER#7	Boiler No. 7 - Natural gas fired boiler with heat input of approximately 127 MMBTU/hr	01-01-50 01-01-68	NA
EUBOILER#8	Natural gas fired boiler with a maximum heat input of 240 MMBTU/hr.	01-01-59 01-01-68	NA
EUBOILER#9	Boiler No. 9 - Natural gas and fuel oil fired boiler equipped with low NOx burners and flue gas recirculation with a maximum heat input of approximately 227 MMBTU/hr.	10-01-91 NA	NA
EUBOILER#10	311 MMBtu/hr natural gas fired boiler used to heat steam for dryer and hot water to be used on the paper machine.	Permit Issue Date	FGBOILERS10-11, FGPROJECT2019
EUBOILER#11	311 MMBtu/hr natural gas fired boiler used to heat steam for dryer and hot water to be used on the paper machine.	Permit Issue Date	FGBOILERS10-11 FGPROJECT2019,
EUCALENDARHEAT1	2.8 MMBtu/hr natural gas fired Precoat Calendar Heater,	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUCALENDARHEAT2	2.8 MMBtu/hr natural gas fired Precoat Calendar Heater,	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUDRYER1	27.6 MMBtu/hr natural gas fired Air Impingement Dryer - Predryer section of the paperboard machine.	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUDRYER2	6.1 MMBtu/hr natural gas fired High Intensity Air Dryer after 1st Coater in the paperboard machine.	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUDRYER3	7.6 MMBtu/hr natural gas fired Air Dryer after 1st Coater of the paperboard machine	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUDRYER4	7.5 MMBtu/hr Infrared Dryer after 2nd Coater of the paperboard machine.	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUDRYER5	7.6 MMBtu/hr natural gas fired Air Dryer after 2nd Coater of the paperboard machine.	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUDRYER6	7.6 MMBtu/hr natural gas fired Air Dryer after 2nd Coater of the paperboard machine.	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUDRYER7	7.6 MMBtu/hr natural gas fired Air Dryer after 2nd Coater of the paperboard machine.	Permit Issue Date	FGK2MACHINE, FGPROJECT2019
EUCOOLINGTW1	Utility Cooling Tower- 6,227 gallon per minute water flowrate	Permit Issue Date	FGPROJECT2019

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUSTARCH	10,600 cubic feet silo, starch preparation and handling equipment, and starch application equipment. Cylindrical jacket with conical discharge, includes dust bin vent filter.	Permit Issue Date	FGPROJECT2019
EUAMU	Natural gas Air Makeup Units (AMU) with a combined heat capacity of 106.5 MMBtu/hr	Permit Issue Date	NA

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

EUBOILER#7
EMISSION UNIT CONDITIONS

DESCRIPTION

EUBOILER#7 is a natural gas boiler with a maximum heat input of 127 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in EUBOILER#7. **(R 336.1201(3))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall burn only pipeline quality natural gas in EUBOILER#7. **(R 336.1201(3))**

2. The permittee shall permanently shutdown EUBOILER#7 on or before May 1, 2022. **(R 336.1205)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years.

1. The permittee shall monitor and record the natural gas consumption rate, in million cubic feet, for each calendar month. **(R 336.1205)**

VII. REPORTING

1. The permittee shall submit notification of the permanent shutdown of EUBOILER#7 as required by SC III.2 within 30 days of the shutdown date. **(R 336.1205, R 336.1201(7))**

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. SVBOILER#7	88	80	40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

NA

EUBOILER#8
EMISSION UNIT CONDITIONS

DESCRIPTION

EUBOILER#8 is a natural gas boiler with a maximum heat input of 240 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. NOx	40.4*tpy	12-month rolling time period as determined at the end of each calendar month	EUBOILER#8	SC VI.3	R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d)
2. NO_X	154 lb/MMCF	Hourly	EUBOILER#8	SC V.1	R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d)
* Established based on an emission factor of 154 lb/MMCF of natural gas burned and the fuel restriction in SC II.1. This limit applies upon the date of initial startup as cited in SC VII.1 of FGBOILERS10-11					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Natural Gas	525 MMCF/yr*	12-month rolling time period as determined at the end of each calendar month	EUBOILER#8	SC VI.2	R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21 (c) & (d)
*This limit applies upon the date of initial startup as cited in SC VII.1 of FGBOILERS10-11					

2. The permittee shall burn only pipeline quality natural gas in EUBOILER#8. **(R 336.1205, 40 CFR 52.21(c) and (d), 40 CFR 52.21(a)(2)(iv))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

2. The permittee shall not operate EUBOILER#8 with a maximum heat input in excess of 240 million BTU per hour. **(R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d)))**

3. The permittee shall not operate EUBOILER#8 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 180 days of permit issuance, and is implemented and maintained.

The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment and shall 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.
d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions.

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 90 days after such an event occurs. The permittee shall also amend the MAP within 90 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 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall verify NO_X emission rates in lb/MMCF of natural gas from EUBOILER#8 at least once every 60 months by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 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 or schedule that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.**(R 336.1205, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.2(c) & (d))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, 40 CFR 52.21(a)(2)(iv),40 CFR 52.21 (c) & (d))**

2. The permittee shall monitor and record the total natural gas consumption rate, in million cubic feet, for each calendar month and 12-month rolling time period. **(R 336.1205, 40 CFR 52.21(a)(2)(iv),40 CFR 52.21 (c) & (d))**

3. The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculations for NOx. The emission calculations will be based upon the fuel used and the lb/MMCF emission rate from the most recent stack test. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1)(a), R 336.1205(3), R 336.1225, R 336.1702, R 336.2802, 40 CFR 52.21)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
2. SVBOILER#8	69	115	40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with SC I-1. and SC II.1 upon the date of initial startup as cited in SC VII.1 of FGBOILERS10-11. **(40 CFR 52.21(a)(2)(iv))**

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

EUBOILER#9
EMISSION UNIT CONDITIONS

DESCRIPTION

EUBOILER#9 is a natural gas boiler with a maximum heat input of 227 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Low NOx burners and flue gas recirculation

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.06 lbs/MMBTU of heat input	24-hour average	EUBOILER#9	SC VI.1 SC VI.3	R 336.1205
2. NOx	13.6 pph	Hourly	EUBOILER#9	SC VI.1 SC VI.3	R 336.1205, 40 CFR 52.21(c) & (d)
3. NOx	59.6 tpy*	12-month rolling time period as determined at the end of each calendar month	EUBOILER#9	SC VI.1 SC VI.3	R 336.1205, 40 CFR 52.21(a)(2)(iv)
4. Total gaseous NMOC, measured as methane	0.025 lbs/MMBTU of heat input	Hourly	EUBOILER#9	SC V.1	R 336.1702(a)
5. Total gaseous NMOC, measured as methane	5.7 pph	Hourly	EUBOILER#9	SC V.1	R 336.1702(a)

***Established based on 0.06 lb/MMBtu and the maximum capacity of the boiler of 227 MMBtu/hr

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall burn only natural gas in EUBOILER#9. **(R 336.1205)**

2. The permittee shall not operate EUBOILER#9 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 180 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment and shall 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.
d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions.

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 90 days after such an event occurs. The permittee shall also amend the MAP within 90 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 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUBOILER#9 unless the associated flue gas recirculation system and low NOx burners are installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP as required in SC III.2. **(R 336.1910, 40 CFR 52.21(j))**

2. The permittee shall not operate EUBOILER#9 unless the associated continuous emission monitor system (CEMS) to record NOx emissions is installed and operating properly as determined by the District Supervisor. **(40 CFR 60.13(f), 40 CFR 60.48b(b))**

3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the NO_X emissions and Btu rate for EUBOILER#9 on a continuous basis. The permittee shall install and operate the CEMS to meet the timelines, requirements and reporting in accordance with 40 CFR Part 60. **(R 336.1205, R 336.2802, 40 CFR 52.21)**

V. TESTING/SAMPLING

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

1. The permittee shall verify NMOC emission rates in pph of natural gas from EUBOILER#9 at least once every 60 months by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 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 or schedule that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.**(R 336.1205, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.2(c) & (d))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall perform all monitoring and recording of emissions and operating information as required to comply with the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A and Db. All required reporting shall be submitted to the District Supervisor in an acceptable format within 30 days following the end of the quarter in which the data were collected. **(40 CFR 60.49b)**

2. The permittee shall calculate and record the NOx emission rate in pph, lb/MMBtu, and tons per calendar month. The permittee shall also calculate and record the 12-month rolling time period NOx rate, as determined

at the end of each calendar month. These emission rates shall be derived from the average concentration of NOx emissions in ppm recorded by the CEM. **(R 336.1205, 40 CFR 52.21(j))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOILER#9	64.2	115.0	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Db, as they apply to EUBOILER#9. **(**40 CFR 60 Subparts A and Db**)**

EUAMU
EMISSION UNIT CONDITIONS

DESCRIPTION

Natural gas Air Makeup Units (AMU) with a combined heat capacity of 106.5 MMBtu/hr

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	6.6 tpy*	12-month rolling time period as determined at the end of each calendar month	EUAMU	SC VI.2	R 336.1205, 40 CFR 52.21(a)(2)(iv)
* Established based on an emission factor of 50 lb/MMCF natural gas burned and the natural gas usage limit in SC II.1					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Natural Gas	262.8MMCF/yr	12-month rolling time period as determined at the end of each calendar month	EUAMU	SC VI.1	R 336.1205(1)(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

1. The permittee shall monitor and record, in a satisfactory manner, natural gas usage in EUAMU on a monthly and 12-month rolling time period basis. **(R 336.1205)**

2. The permittee shall calculate the total NOx emissions from EUAMU on a monthly and 12-month rolling time period basis. This calculation will be based upon the fuel usage and the emission factor of 50 lb/MMCF

natural gas burned. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

EUCOOLINGTW1
EMISSION UNIT CONDITIONS

DESCRIPTION

Utility Cooling Tower- 6,227 gallon per minute water flowrate

Flexible Group ID: FGPROJECT2019

POLLUTION CONTROL EQUIPMENT

Drift eliminator

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUCOOLINGTW1 if total dissolved solids (TDS) exceeds 860 ppmw. **(R 336.1205, R 336.1702, R 336.1910, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not install a cooling tower which exceeds 6,227 gpm for EUCOOLINGTW1. **(R 336.1205, R 336.1910, 40 CFR 52.21(c) & (d))**

2. The permittee shall equip and maintain EUCOOLTWR with drift eliminators that have a vendor-certified maximum drift rate of 0.001 percent or less. **(R 336.1901)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall continuously monitor the TDS for each tower and maintain an automatic blowdown system to prevent the TDS from exceeding the limit in SC III.2. The permittee shall maintain records of any maintenance, calibration, or setting changes for the blow-down systems as they occur. **(R 336.1205, R 336.1910, 40 CFR 52.21(c) & (d))**

2. The permittee shall maintain the vendor certification of the maximum drift rate for EUCOOLTWR. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1901)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVUTILCOOL1	144	66	40 CFR 52.21(c) & (d)
2. SVUTILCOOL2	144	66	40 CFR 52.21(c) & (d)
2. SVUTILCOOL3	144	66	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

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

EUSTARCH
EMISSION UNIT CONDITIONS

DESCRIPTION

10,600 cubic feet silo, starch preparation and handling equipment, and starch application equipment. Cylindrical jacket with conical discharge, includes dust bin vent filter.

Flexible Group ID: FGPROJECT2019

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. There shall be no outdoor visible emissions from EUSTARCH. **(R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUSTARCH unless the bin filters on the silos are installed, maintained, and operated in a satisfactory manner. **(R 336.1205, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

2. The permittee shall not operate EUSTARCH unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 180 days after installation of EUSTARCH, and is implemented and maintained. The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment and shall 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.
   d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions.

   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 90 days after such an event occurs. The permittee shall also amend the MAP within 90 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 336.1911)**

V. TESTING/SAMPLING

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

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain records of the inspections and replacements of the bin filters on the silos. **(R 336.1205, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

VII. REPORTING

1. Within 30 days after completion of the installation of EUSTARCH, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing of the completion of installation. **(R 336.1201(7), 40 CFR 60.49b(a))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSTARCHSIL	40	80*	**40 CFR 52.21(c) & (d)**
*Horizontal stack exhaust			

IX. OTHER REQUIREMENT(S)

NA

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

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGK2MACHINE	2,400 tons per day, paperboard machine with in-line paperboard coating process. This emission unit includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, and curtain coater and drying ovens.	EUK2MACHINE, EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4, EUDRYER5, EUDRYER6, EUDRYER7, EUCALENDARHEAT1, EUCALENDARHEAT2
FGBOILERS10-11	Two 311 MMBtu/hr natural gas fired boilers used to heat steam for dryer and hot water to be used on the paper machine.	EUBOILER#10, EUBOILER#11
FGPROJECT2019	All new equipment being permitted in the 2019 project.	EUK2MACHINE, EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4, EUDRYER5, EUDRYER6, EUDRYER7, EUCOOLINGTW1, , EUSTARCH, EUEUBOILER#10, EUBOILER#11, EUCALENDARHEAT1, EUCALENDARHEAT2

FGK2MACHINE
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

2,400 tons per day, paperboard machine with in-line paperboard coating process. This emission unit includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, and curtain coater and drying ovens.

Emission Unit: EUK2MACHINE, EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4, EUDRYER5, EUDRYER6, EUDRYER7, EUCALENDARHEAT1, EUCALENDARHEAT2

POLLUTION CONTROL EQUIPMENT

NA

II. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	29.3 tpy[a]	12-month rolling time period as determined at the end of each calendar month	FGK2MACHINE	SC VI.2, SC VI.3	R 336.1702(a), R 336.1205(3)
2. NOx	16.5 tpy[b]	12-month rolling time period as determined at the end of each calendar month	FGK2MACHINE	SC VI.6	R 336.1205
3. Acetaldehyde[1]	5,685 lb/year	12-month rolling time period as determined at the end of each calendar month	FGK2MACHINE	SC VI.2, SC VI.3	R 336.1225(3)
4. Acrylamide[1]	116 lb/year	12-month rolling time period as determined at the end of each calendar month	FGK2MACHINE	SC VI.2, SC VI.3	R 336.1225(3)

[a] Established based on 0.0837 lb VOC per ton of paperboard produced plus 5.5 lb/MMCF of natural gas combusted. The annual amount of paperboard produced is limited in SC II.1 and the maximum heat capacities of all fuel combustion equipment in FGK2MACHINE was used.

[b] Established based on an emission factor of 50 lb/MMCF of natural gas burned and total maximum heat capacities of all the fuel combusting equipment in FGK2MACHINE. Compliance will be demonstrated based upon actual material usage.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Paperboard Produced[1]	657,000 tons/yr	12-month rolling time period as determined at the end of each calendar month	EUK2MACHINE	SC VI.3	R 336.1205, R 336.1225, R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall handle all VOC and/or HAP containing materials used in FGK2MACHINE in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install the dryers in FGK2MACHINE with a maximum capacity not to exceed the heat inputs listed in the table below. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910)**

EUDRYER1	27.6 MMBtu/hr
EUDRYER2	6.1 MMBtu/hr
EUDRYER3	7.6 MMBtu/hr
EUDRYER4	7.5 MMBtu/hr
EUDRYER5	7.6 MMBtu/hr
EUDRYER6	7.6 MMBtu/hr
EUDRYER7	7.6 MMBtu/hr
EUCALENDARHEAT1	2.8 MMBtu/hr
EUCALENDARHEAT2	2.8 MMBtu/hr

V. TESTING/SAMPLING

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

1. The permittee shall verify the VOC content of any material used in FGK2MACHINE using federal Reference Test Method 24/24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24/24A and the formulation values should differ, the permittee shall use the Method 24/24A results to determine compliance. **(R 336.1205, R 336.1702(a), 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 336.1201(3))**

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

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material used in FGK2MACHINE, including the weight percent of each toxic air contaminant. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information on a monthly basis for EUK2MACHINE:
   a) Tons of paper produced on a monthly and 12-month rolling time period basis.
   b) Pounds or tons of each VOC containing material used and reclaimed.
   c) VOC content (minus water and with water) of each material as applied.
   d) Pounds or tons (with water) of each Acetaldehyde and Acrylamide containing material used and reclaimed. [1]
   e) Acetaldehyde and Acrylamide content (with water) in percent by weight of each material used. [1]
   f) VOC mass emission calculations determining the monthly emission rate in tons per calendar month using mass balance, or an alternative method acceptable to the AQD District Supervisor.
   g) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month using mass balance, or an alternative method acceptable to the AQD District Supervisor.

h) Acetaldehyde and Acrylamide mass emission calculations determining the monthly emission rate in pounds per calendar month using mass balance, or an alternative method acceptable to the AQD District Supervisor.[1]

i) Acetaldehyde and Acrylamide mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month using mass balance, or an alternative method acceptable to the AQD District Supervisor.[1]

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(a), R 336.1225)**

4. The permittee shall keep a record of the amount of natural gas burned in FGK2MACHINE on a monthly and 12-month rolling time period basis. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205)**

5. The permittee shall calculate the total NOx emissions from FGK2MACHINE on a monthly and 12-month rolling time period basis. The calculation shall be based upon the recorded amount of natural burned and 50 lb of NOx/MMCF of natural gas burned. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWETEND1	66	100	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVWETEND2	66	100	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVWETEND3	66	100	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVWETEND4	48	100	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVDRYERV1	44	100	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVDRYERV2	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
6. SVDRYERV3	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
7. SVDRYERV4	25	110	R 336.1225, 40 CFR 52.21(c) & (d)
8. SVDRYERV5	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
9. SVDRYERV6	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
10. SVDRYERV7	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
11. SVCALENDAR1	16	50	R 336.1225, 40 CFR 52.21(c) & (d)
12. SVCALENDAR2	16	50	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

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

FGBOILERS10-11
EMISSION UNIT CONDITIONS

DESCRIPTION

Two 311 MMBtu/hr natural gas fired boiler used to heat steam for dryer and hot water to be used on the paper machine.

Emission Unit: EUBOILER#10, EUBOILER#11

POLLUTION CONTROL EQUIPMENT

Low-NOX Burners (LNB) and Flue Gas Recirculation (FGR)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. NO_x[a]	0.036 lb/MMBtu	Hourly	Each boiler in FGBOILERS10-11.	SC V.1	R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d), 40 CFR 60.44b(a)(1)
2. PM10[b]	0.004 lb/MMBtu	Hourly	Each boiler in FGBOILERS10-11.	SC V.1	R 336.1331, 40 CFR 52.21 (c) and (d)
3. PM2.5	0.004 lb/MMBtu	Hourly	Each boiler in FGBOILERS10-11.	SC V.1	R 336.1331, 40 CFR 52.21 (c) and (d)

[a] Emission limit for NOx subsumes the Subpart Db requirement of 0.10 lb/MMBtu
[b] PMemissions restricted by PM10 emission limit

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in FGBOILERS10-11. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1702, 40 CFR 52.21(c) and (d), 40 CFR 52.21(a)(2)(iv), 40 CFR Part 60 Subpart Db)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUBOILER#10 or EUBOILER#11 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 180 days of initial startup, and is implemented and maintained for the respective boiler. The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment and shall 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.
d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions

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 90 days after such an event occurs. The permittee shall also amend the MAP within 90 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, R 336.1912, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUBOILER#10 or EUBOILER#11 unless each boiler and emission control equipment for the respective boiler is maintained and operated according to the manufacturer's instructions and the MAP in SC III.1. **(R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))**

2. The permittee shall not install EUBOILER#10 or EUBOILER#11 with a heat capacity in excess of 311 MMBtu/hr per boiler. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910)**

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of initial startup of each boiler in FGBOILERS10-11, the permittee shall verify NOX, PM10 and PM2.5 emission rates from FGBOILERS10-11 by testing at the owner's expense, in accordance with Department requirements. Testing for NO_X shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. Testing for PM10 and PM2.5 shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.**R 336.1205, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.2(c) & (d))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required records 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 recordkeeping, reporting or notification special condition. **(R 336.1205, R 336.1702)**

2. The permittee shall maintain records from the fuel supplier which certify that the gaseous fuel burned in FGBOILERS10-11meets the definition of natural gas as defined in §60.41b and the applicable sulfur limit. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR Part 60 Subpart Db)**

3. The permittee shall maintain the manufacturer's written instructions for operating and maintaining each boiler in FGBOILERS10-11 and emission control equipment. The permittee shall maintain records of all maintenance performed on the boiler and emission control equipment. (**R 336.1205, R 336.1910, 40 CFR Part 60 Subpart Db)**

4. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:

a. Compliance tests and any testing required under the special conditions of this permit;
b. Verification of heat input capacity required to show compliance with SC IV.3.

(R 336.1205(1), R 336.1224, R 336.1225, R 336.1301, R 336.1702(a), 40 CFR 52.21(c) and (d), 40 CFR 52.21(a)(2)(iv), CFR Part 60 Subpart Db)

VII. REPORTING

1. The owner or operator of each affected facility shall submit notification of the date of initial startup of EUBOILER#10 and EUBOILER#11, as provided by §60.7. This notification shall include the information specified in §60.49b. **(R 336.1201(7), 40 CFR 60.49b(a))**

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBLR10	63	110	R 336.1225, 40 CFR 52.21(c) and (d)
2. SVBLR11	63	110	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Db, as they apply to FGBOILERS10-11. **(40 CFR Part 60 Subparts A & Db)**

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

FGPROJECT2019
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All new equipment being permitted in the 2019 project.

Emission Unit: EUK2MACHINE, EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4, EUDRYER5, EUDRYER6, EUDRYER7, EUCOOLINGTW1, EUSTARCH, EUEUBOILER#10, EUBOILER#11, EUCALENDARHEAT1, EUCALENDARHEAT2

POLLUTION CONTROL EQUIPMENT

There is a bin filter on the silo. The Boilers are equipped with Low-NO_X Burners (LNB) and Flue Gas Recirculation (FGR).

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall implement the Odor Investigation Plan approved by AQD on June 4, 2020. The permittee shall submit a report of the results to the AQD Technical Programs Unit and District Office within 30 days of completing the odor investigation. **(R336.1901(b))**

2. Within 60 days of submitting the results report from the Odor Investigation Plan, the permittee shall submit a proposed Nuisance Minimization Plan for Odors and an implementation schedule to the AQD District Office Supervisor for approval. **R336.1901(b))**

3. The permittee shall not operate FGPROJECT2019 after Nuisance Minimization Plan as described in SC III.2 is submitted unless the plan is implemented in accordance with its terms. The Nuisance Minimization Plan shall, at minimum, include the following:
   a. Identification of the supervisory personnel responsible for overseeing the implementation of the plan,
   b. An identification of the sources of potential nuisance odor issues and how the odors from those sources will be minimized and monitored,
   c. A description of the items or conditions that shall be implemented as part of the plan,
   d. The timeline for making any physical or operational changes and the frequency of any associated inspections or monitoring,
   e. Proposed operation and data collection. Such data collection shall include the continued operation of the existing H2S Envirosuite stationary monitoring system for a minimum of twelve months following initial startup of process equipment in FGPROJECT2019. The data collected by the permittee must be made available to the Department upon request.
   f. A description of the corrective procedures or operational changes that shall be taken in the event of an elevated odor event.

   After submission of the plan by the permittee, the AQD District Office Supervisor may request modifications to the plan. Within 30 days after a request by the AQD District Office Supervisor, the permittee shall submit proposed modifications to the plan for consideration by the Department. The permittee shall submit the Nuisance Minimization Plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the Nuisance Minimization Plan or amendments to the plan shall be considered approved. **(R336.1901(b))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

1 The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1).The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal. **(R 336.1225(4))**[1]

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

Attachment 2

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

EFFECTIVE DATE: April 15, 2015

ISSUED TO

Graphic Packaging International, ~~Inc~~LLC~~.~~

State Registration Number (SRN): B1678

LOCATED AT

1421 and 1500 North Pitcher Street, Kalamazoo, Michigan 49007

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B1678-2015

Expiration Date: April 15, 2020

Administratively Complete ROP Renewal Application Due Between October 15, 2018 and October 15, 2019

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B1678-2015

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

Michigan Department of Environment, Great Lakes, and Energy~~al Quality~~

Mary A. Douglas, Kalamazoo 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~~al Quality~~ (~~MDEQ~~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 are state-only enforceable will be noted as such.

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

SECTION 1 - MILL

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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
    b. A limit specified by an applicable federal new source performance standard.

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

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

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).[2] **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP **(R 336.1213(3)(c))**:
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
    a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
    b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be

submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.[2] **(R 336.1912)**

Permit Shield

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

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

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
    d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.

37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. [2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. [2] **(R 336.1201(8) Section 5510 of Act 451)**

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, ~~MDEQ~~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, ~~MDEQ~~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:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. The stationary source-wide, Section 1 and Section 2 combined, emission rate of an individual HAP shall be less than 9.9 tons per 12-month rolling time period. **(R 336.1213(2))**

2. The stationary source-wide, Section 1 and Section 2 combined, emission rate of total combined HAPs shall be less than 24.9 tons per 12-month rolling time period. **(R 336.1213(2))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall calculate and record the stationary source-wide, Section 1 and Section 2 combined, emission rates, in tons, for each single HAP and total combined HAPs for each calendar month and each 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))**

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). **(R 336.1213(4)(c))**

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
~~EUBOILER#7~~	~~Boiler No. 7 - Natural gas fired boiler with heat input of approximately 127 MMBTU/hr.~~	~~01-01-50~~ 01-01-68	~~NA~~
EUBOILER#8	~~Boiler No. 8~~ EUBOILER#8 ~~is a N~~natural gas ~~and No. 6 fuel oil fired~~ boiler with a maximum heat input of 240 MMBTU/hr.	01-01-59 01-01-68	NA
EUBOILER#9	~~Boiler No. 9~~ EUBOILER#9~~ is a N~~natural gas ~~and fuel oil fired~~ boiler equipped with low NO_x burners and flue gas recirculation with a maximum heat input of approximately 227 MMBTU/hr.	10-01-91 NA	NA
EUBOILER#10	311 MMBtu/hr natural gas fired boiler used to heat steam for dryer and hot water to be used on the paper machine.	12/01/2021	FGBOILERS10-11, FGPROJECT2019
EUBOILER#11	311 MMBtu/hr natural gas fired boiler used to heat steam for dryer and hot water to be used on the paper machine.	12/01/2021	FGBOILERS10-11, FGPROJECT2019
EUK1MACHINE	K1 paperboard machine with in-line paperboard coating process. It includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, bar coater, ~~air-knife~~curtain coater, six drying ovens, starch preparation and handling equipment, and starch application equipment.	01-01-91 10-20-11 09-12-13	NA
EUK2AMU	Natural gas Air Makeup Units (AMU) installed on K2 portion of the facility with a combined heat capacity of 106.5 MMBtu/hr	TBD	NA
EUK2CALENDARHEAT1	2.8 MMBtu/hr natural gas fired Precoat Calendar Heater.	TBD	FGK2MACHINE, FGPROJECT2019
EUK2CALENDARHEAT2	2.8 MMBtu/hr natural gas fired Precoat Calendar Heater.	TBD	FGK2MACHINE, FGPROJECT2019
EUK2COOLINGTW1	Utility Cooling Tower- 6,227 gallon per minute water flowrate on the K2 paperboard machine	TBD	FGPROJECT2019
EUK2DRYER1	27.6 MMBtu/hr natural gas fired Air Impingement Dryer - Predryer section of the K2 paperboard machine.	TBD	FGK2MACHINE, FGPROJECT2019
EUK2DRYER2	6.1 MMBtu/hr natural gas fired High Intensity Air Dryer after 1st Coater in the K2 paperboard machine.	TBD	FGK2MACHINE, FGPROJECT2019

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUK2DRYER3	7.6 MMBtu/hr natural gas fired Air Dryer after 1st Coater of the K2 paperboard machine	TBD	FGK2MACHINE, FGPROJECT2019
EUDRYER4	7.5 MMBtu/hr Infrared Dryer after 2nd Coater of the K2 paperboard machine.	TBD	FGK2MACHINE, FGPROJECT2019
EUDRYER5	7.6 MMBtu/hr natural gas fired Air Dryer after 2nd Coater of the K2 paperboard machine.	TBD	FGK2MACHINE, FGPROJECT2019
EUDRYER6	7.6 MMBtu/hr natural gas fired Air Dryer after 2nd Coater of the K2 paperboard machine.	TBD	FGK2MACHINE, FGPROJECT2019
EUDRYER7	7.6 MMBtu/hr natural gas fired Air Dryer after 2nd Coater of the K2 paperboard machine.	TBD	FGK2MACHINE, FGPROJECT2019
EUK2MACHINE	Material handling process including dry and wet end process, steam heated drying cylinders, coating preparation and handling equipment, curtain coater of the paperboard machine and associated natural gas fired dryers.	TBD	FGK2MACHINE, FGPROJECT2019
EUK2STARCH	10,600 cubic feet silo, starch preparation and handling equipment, and starch application Equipment on the K2 paperboard machine. Cylindrical jacket with conical discharge, includes dust bin vent filter.	TBD	
EUK3MACHINE	K3 paperboard machine with in-line paperboard coating process. It includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, a bar coater, an air-knife coater, drying ovens, starch preparation and handling equipment, and starch application equipment.	01-01-37 05-01-98 10-20-11	NA
~~EUCONVERTDEPT~~	~~Off-line paperboard coater located in the converting department.~~	~~01-01-83~~ ~~NA~~	~~NA~~
EUCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201, pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	<07-01-79 >07-01-79	FGCOLDCLEANERS
EUCONVERTETHYLACETATE	Ethyl acetate used to clean wax off the "back-up rolls" on converting coater.	01-01-83 NA	FGRULE290
~~EUMILLCYCLONES~~	~~Cyclones that control the converting department trimmer.~~	~~01-01-83~~ ~~NA~~	~~FGRULE290~~
EUFIREPUMP	Diesel powered emergency fire pump rated at 185 bhp.	1982 NA	FG-EMERG-RICE
EU01GASTANK	An existing stationary gasoline dispensing facility located at an area source of hazardous air pollutant that has a maximum monthly gasoline throughput of <10,000 gallons.	01-01-97 NA	NA

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EUBOILER#7
EMISSION UNIT CONDITIONS

This emission unit is required to be dismantled by May 1, 2022.

DESCRIPTION

Boiler No. 7 - Natural gas fired boiler with heat input of approximately 127 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. EUBOILER#7 shall only be fired with sweet natural gas.[2] **(R 336.1201(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 shall monitor and record the natural gas consumption rate, in million cubic feet, for each calendar month. **(R 336.1213(3)(b))**

See Appendix 1.4

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 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBOILER#7	88.0[2]	80.0[2]	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

NA

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

EUBOILERS#8
EMISSION UNIT CONDITIONS

DESCRIPTION

EUBOILER#8 is a natural gas boiler ~~Boiler No. 8 - Natural gas and No. 6 fuel oil fired boiler~~ with a maximum heat input of 240 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	40.4*tpy	12-month rolling time period as determined at the end of each calendar month	EUBOILER#8	SC VI.3	R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d)
2. NOx	154 lb/MMCF		EUBOILER#8	SC V.1	R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d)
* Established based on an emission factor of 154 lb/MMCF of natural gas burned and the fuel restriction in SC II.1. This limit applies upon the date of initial startup as cited in SC VII.1 of FGBOILERS10-11					

~~NA~~

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. ~~Sulfur Content in Fuel Oil~~Natural Gas	~~Equivalent of 1.5%[2]~~525 MMCF/yr*	12-month rolling time period as determined at the end of each calendar month~~See below *[2]~~	EUBOILER#8	SC VI.~~25~~	R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d)~~R 336.1401(1) - Table 41~~

~~*The maximum sulfur content in fuel is defined as the average sulfur content in all fuels burned, including natural gas, at any one time in a power plant. The sulfur content shall be calculated on the basis of 18,000 BTUs per pound of liquid fuels.~~ This limit applies upon the date of initial startup as cited in SC VII.1 of FGBOILERS10-11

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2. 2. The permittee shall burn only pipeline quality natural gas in EUBOILER#8. **(R 336.1205, 40 CFR 52.21(c) and (d), 40 CFR 52.21(a)(2)(iv))**

~~2. Any boiler that is gaseous fuel fired and also has the capability of using liquid fuel and does not have the capability of biomass and/or coal firing, shall be considered a gaseous fuel fired boiler unless the liquid fuel use is greater than 48 hours per calendar year for periodic testing, at which time the unit is designated as an existing oil subcategory. The use of liquid fuel during gas curtailments, gas supply interruption, startups or periodic testing does not change a boiler's designation from a gaseous fuel fired boiler to an oil subcategory. **(40 CFR 63.11237)**~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. ~~The maximum heat input shall not exceed 240 million BTU per hour. **(R 336.1213(2)(d), R 336.1205(1)(a))**~~**The permittee shall not operate EUBOILER#8 with a maximum heat input in excess of 240 million BTU per hour. (R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d))**

2. ~~EUBOILER#8 shall only be fired with sweet natural gas and/or fuel oil.[2] **(R 336.1201(3))**~~**The permittee shall not operate EUBOILER#8 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been implemented and maintained.**

The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment and shall 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.

d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions.

~~2.~~ 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 90 days after such an event occurs. The permittee shall also amend the MAP within 90 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 336.1911)

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~~

1. The permittee shall verify NO_X emission rates in lb/MMCF of natural gas from EUBOILER#8 at least once every 60 months by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 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 or schedule that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.**(R 336.1205, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.2(c) & (d))**

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VI. MONITORING/RECORDKEEPING

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

~~1. The permittee shall monitor and record the actual hours of operation for each operating day. The permittee shall also monitor and record the total hours of operation for each calendar month. **(R 336.1213(3))**~~

~~2. The permittee shall monitor and record the fuel oil consumption rates, in gallons, for each operating day. The permittee shall also monitor and record the total fuel oil consumption rate, in gallons, for each calendar month. **(R 336.1213(3)(b))**~~

~~3. The permittee shall monitor and record the natural gas consumption rate, in million cubic feet, for each operating day. The permittee shall also monitor and record the total natural gas consumption rate, in million cubic feet, for each calendar month. **(R 336.1213(3)(b))**~~

~~4. The permittee shall calculate the total average daily heat input. The average daily heat input shall be calculated by multiplying the total of each fuel consumed by the standard heating value for the respective fuel and by dividing by the actual operating hours for that calendar day. The permittee need not perform these calculations on a daily basis. The permittee may elect to perform all calculations at the end of each calendar month. The calculations may be performed manually or the daily data may be entered into an electronic system and calculated electronically at the end of the calendar month. **(R 336.1213(3))**~~

~~5. The permittee shall maintain a complete record of the fuel oil analysis of all fuel oil shipments, as supplied by the vendor. This record shall include the percent sulfur content and the BTU rating per pound of liquid fuel. **(R 336.1213(3)(b))**~~

~~6. While firing residual fuel oil (residual fuel oil means fuel oil grades no. 3 through no. 6), the permittee shall perform and record the results of a six-minute visible emission check of SVBOILER#8 immediately after each start-up occurrence and at least once per calendar day thereafter during maximum routine operating conditions. If visible emissions are observed, the permittee shall implement the monitoring program listed in Appendix 1.3. **(R 336.1213(3))**~~

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, 40 CFR 52.21(a)(2)(iv),40 CFR 52.21 (c) & (d))**
2. The permittee shall monitor and record the total natural gas consumption rate, in million cubic feet, for each calendar month and 12-month rolling time period. **(R 336.1205, 40 CFR 52.21(a)(2)(iv),40 CFR 52.21 (c) & (d))**
3. The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculations for NOx. The emission calculations will be based upon the fuel used and the lb/MMCF emission rate from the most recent stack test. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1)(a), R 336.1205(3), R 336.1225, R 336.1702, R 336.2802, 40 CFR 52.21)**

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See Appendix 1.3

VII. REPORTING

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBOILER#8	~~NA~~69	115.0[2]	**R 336.1201(3)**

IX. OTHER REQUIREMENT(S)

~~1.~~ The permittee shall implement the Malfunction Abatement Program outlined in Appendix 1.9 when visible emissions have been observed (see VI.6 above and Appendix 1.3). **(R 336.1213(3))**

2. The permittee shall meet the monitoring, record keeping, and reporting requirements of the NOx SIP Call during the ozone season (May 1 through September 30), in accordance with 40 CFR Part 96, Subpart H or the equivakent Michigan rule.

~~3. The permittee shall comply with the CAIR Ozone NOx Trading Program provisions of 40 CFR, Part 97.301 through 40 CFR, Part 97.388 as adopted and modified by R 336.1802a, R 336.1803 and R 336.1821 through R 336.1826 and as outlined in any complete CAIR Ozone NOx Permit issued by the AQD. The CAIR Ozone NOx Permit No. MI-NOO-10698-2015 is hereby incorporated into this ROP as Appendix 1.10. **(R 336.1821)**~~

~~4.~~3. ~~The permittee shall hold allowances for compliance deductions in the source's compliance account of the allowance transfer deadline in an amount not less than the total NOx emissions for the control period from the source pursuant to 40 CFR, Part 97.354. **(40 CFR, Part 97.354)**~~

Footnotes:

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

EUBOILER#9
EMISSION UNIT CONDITIONS

DESCRIPTION

EUBOILER#9 is a natural gas boiler ~~Boiler No. 9 - Natural gas and fuel oil fired boiler equipped with low NO_x burners and flue gas recirculation~~ with a maximum heat input of approximately 227 MMBTU/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Low NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

~~1. The NOx emission rate, when firing natural gas only, shall not exceed 0.06 pounds per MMBTUs of heat input based upon a 24-hour averaging period.[2] **(40 CFR 52.21(j))**~~

~~2. The NOx emission rate, when firing natural gas only, shall not exceed 13.6 pph.[2] **(40 CFR 52.21(j))**~~

~~3. The NOx emission rate, when firing fuel oil only, shall not exceed 0.20 pounds per MMBTUs of heat input based upon a 24-hour averaging period.[2] **(40 CFR 60.44b(a), 40 CFR 52.21(j))**~~

~~4. The NOx emission rate, when firing fuel oil only, shall not exceed 43.42 pph.[2] **(40 CFR 60.44b(a), 40 CFR 52.21(j))**~~

~~5. The total NOx emission rate shall not exceed 69.3 tpy, based upon a 12-month rolling time period.[2] **(40 CFR 52.21(j))**~~

~~6. The particulate emission rate, when firing fuel oil only, shall not exceed 0.03 pounds per MMBTUs of heat input.[2] **(R 336.1201(3))**~~

~~7. The particulate emission rate, when firing fuel oil only, shall not exceed 6.51 pph.[2] **(R 336.1201(3))**~~

~~8. The particulate emission rate, when firing fuel oil, shall not exceed 2.12 tpy, based upon a 12-month rolling averaging period.[2] **(R 336.1201(3))**~~

~~9. The SO2 emission rate, when firing fuel oil, shall not exceed 0.48 pounds per MMBTUs heat input, based upon a 24 hour averaging period.[2] **(R 336.1201(3))**~~

~~10. The SO2 emission rate, when firing fuel oil only, shall not exceed 104.2 pph.[2] **(R 336.1201(3))**~~

~~11. The total SO2 emission rate shall not exceed 34.0 tpy, based upon a 12-month rolling time period.[2] **(R 336.1201(3))**~~

~~12. The total gaseous non-methane organics emissions, measured as methane, when firing natural gas and/or fuel oil, shall not exceed 0.025 pounds per MMBTUs heat input.[2] **(R 336.1702(a))**~~

~~13. The total gaseous non-methane organics emissions, measured as methane, when firing natural gas and/or fuel oil, shall not exceed 5.7 pph.[2] **(R 336.1702(a))**~~

II. MATERIAL LIMIT(S)

~~1. The maximum sulfur content in fuel oil shall not exceed the equivalent of 0.44% as calculated on the basis of 18,300 BTUs per pound of liquid fuels in the EUBOILER#9.[2] **(R 336.1201(3))**~~

~~2. The "annual capacity factor," for fuel oil firing in EUBOILER#9 shall not exceed 0.0715.[2] **(R 336.1201(3))**~~

~~3. Any boiler that is gaseous fuel fired and also has the capability of using liquid fuel and does not have the capability of biomass and/or coal firing, shall be considered a gaseous fuel fired boiler unless the liquid fuel use is greater than 48 hours per calendar year for periodic testing, at which time the unit is designated as an existing oil subcategory. The use of liquid fuel during gas curtailments, gas supply interruption, startups or periodic testing does not change a boiler's designation from a gaseous fuel fired boiler to an oil subcategory. **(40 CFR 63.11237)**~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall burn only natural gas in EUBOILER#9. ~~**(R336.1205)** not fire EUBOILER#9 with fuel oil unless a continuous opacity monitor is installed and operating properly. **(40 CFR 60.48b(a))**~~

2. The permittee shall not operate EUBOILER#9 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been implemented and maintained.

   The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment and shall 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.

   d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions.

   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 90 days after such an event occurs. The permittee shall also amend the MAP within 90 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 336.1911)

~~1.~~

~~2. The permittee shall not operate EUBOILER#9 unless the flue gas recirculation system and the low NOx burners are operating properly.[2] **(R 336.1910)**~~

~~3. The continuous monitoring systems required by 40 CFR 60.48b(b) shall be operated and data recorded during all periods of operation, except for continuous monitoring system breakdowns and repairs. Data should also be recorded during calibration checks and zero and span adjustments. **(40 CFR 60.48b(c))**~~

~~4. The 1-hour average NOx emission rates measured by the continuous NOx monitor shall be expressed in ng/J or lb/million BTU heat input and shall be used to calculate the average emission rates under 40 CFR 60.44b. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13(b). At least 2 data points must be used to calculate each 1-hour average. **(40 CFR 60.48b(d))**~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. ~~EUBOILER#9 shall be equipped with a flue gas recirculation system and low NOx burners.[2]~~ The permittee shall not operate EUBOILER#9 unless the associated flue gas recirculation system and low NOx burners are installed.

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maintained, and operated in a satisfactory manner. Satisfactory manner includes operating and maintaining each control device in accordance with an approved MAP as required in SC III.2. **(R 336.1910, 40 CFR 52.21(j))**

2. ~~EUBOILER#9 shall be equipped with a continuous emission monitor system (CEMS) to record NOx emissions.~~The permittee shall not operate EUBOILER#9 unless the associated continuous emission monitor system (CEMS) to record NOx emissions is installed and operating properly as determined by the District Supervisor. **(40 CFR 60.13(~~nf~~), 40 CFR 60.48b(b))**

~~2.~~3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the NOX emissions and Btu rate for EUBOILER#9 on a continuous basis. The permittee shall install and operate the CEMS to meet the timelines, requirements and reporting in accordance with 40 CFR Part 60. (R 336.1205, R 336.2802, 40 CFR 52.21)

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V. TESTING/SAMPLING

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

1. ~~The permittee shall determine the SO2 emission rate, by testing, within 180 days of initiating the use of fuel oil using a test method that has been approved by the AQD or EPA. **(R 336.1213(3))**~~

2. ~~For the CEMS, Cylinder Gas Audits (CGA) on the NOx and oxygen span gases shall be conducted and recorded in accordance with Quality Assurance methods described in 40 CFR Part 60 Appendix F. The CGA shall be conducted in three of four calendar quarters, but in no more than three quarters in succession.[2] **(R 336.1201(3), 40 CFR Part 60 Appendix F)**~~

3. ~~For the CEMS, a Relative Accuracy Test Audit (RATA) on the NOx and oxygen CEMS shall be conducted and recorded in accordance with Quality Assurance methods described in 40 CFR Part 60 Appendix F. The RATA shall be conducted at least once every four calendar quarters.[2] **(R 336.1201(3), 40 CFR Part 60 Appendix F)**~~

4. ~~The permittee shall perform testing for NOx once during the term of this permit for EUBOILER#9. **(R 336.1213(3))**~~

~~5.~~1. The permittee shall perform testing ~~for total gaseous non-methane organics emissions, measured as methane, once during the term of this permit for EUBOILER#9. **(R 336.1213(3))**~~ The permittee shall verify NMOC emission rates in pph of natural gas from EUBOILER#9 at least once every 60 months by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 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 or schedule that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.(R 336.1205, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.2(c) & (d))

~~**See Section VII below**~~

VI. MONITORING/RECORDKEEPING

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

1. ~~When firing fuel oil, the permittee shall perform the following:~~
   a. ~~Monitor and record opacity emissions on a continuous basis[2], **(40 CFR 60.48b(a))**~~
   b. ~~Record the fuel oil consumption rates, in gallons, for each calendar day and calendar month[2] **(40 CFR 60.49b(d))**~~
   c. ~~Maintain a complete record of the fuel oil analysis of all fuel oil shipments, as supplied by the vendor. The record shall include the percent sulfur content and the BTU rating per pound of liquid fuel.[2] **(40 CFR 60.49b(r))**~~
   d. ~~Calculate and record the "annual capacity factor" for the fuel oil combusted on a monthly basis. The "annual capacity factor" shall be based upon a 12-month averaging period, with a new "annual capacity factor" being calculated at the end of each calendar month (See Appendix 1.7).[2] **(40 CFR 60.49b(d))**~~
   e. ~~Calculate and record the SO2 emission rates, in pph and tons per calendar month. The permittee shall also calculate and record the 12-month rolling time period SO2 emission rate, based upon the use of fuel oil, as determined at the end of each calendar month. **(R 336.1213(3))**~~
   f. ~~Calculate and record the particulate emission rate, in tons emitted, for each calendar month. The permittee shall also calculate and record the 12-month rolling time period particulate emission rate, as determined at the end of each calendar month. **(R 336.1213(3))**~~

g. Keep the following operational records for each calendar day:[2] **(40 CFR 60.49b(p))**
   i. Monitor and record the actual hours of operation.
   ii. Monitor and record the hourly steam load.

2. The permittee shall monitor and record the natural gas consumption rate, in MMCF, for each calendar day. The permittee shall also keep a summary record of the total natural gas usage rate, in MMCF, for each calendar month.[2] **(40 CFR 60.49b(d))**

3. The permittee shall calculate and record the NOx emission rate in pph and tons per calendar month. The permittee shall also calculate and record the 12-month rolling time period NOx rate, as determined at the end of each calendar month. These emission rates shall be derived from the average concentration of NOx emissions in ppm recorded by the CEM. **(R 336.1213(3))**

4. The permittee shall calculate and record the total gaseous non-methane organics emission rate, in pph emitted, for each calendar month. **(R 336.1213(3))**

When NOx emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75% of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.[2] **(40 CFR 60.48b(f))**

1. The permittee shall perform all monitoring and recording of emissions and operating information as required to comply with the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR, Part 60, Subparts A and Db. All required reporting shall be submitted to the District Supervisor in an acceptable format within 30 days following the end of the quarter in which the data were collected. (40 CFR 60.49b)

5.2. The permittee shall calculate and record the NOx emission rate in pph, lb/MMBtu, and tons per calendar month. The permittee shall also calculate and record the 12-month rolling time period NOx rate, as determined at the end of each calendar month. These emission rates shall be derived from the average concentration of NOx emissions in ppm recorded by the CEM. (R 336.1205, 40 CFR 52.21(j))

See Appendix 1.7

VII. REPORTING

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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

4. The permittee shall submit quarterly reports of the following: The reports are due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31. Each quarterly report shall include a summary of each of the following information **(40 CFR 60.49b)**:
   a. Monthly and 12-month rolling time period sulfur dioxide emissions due to the burning of oil, reported in tons emitted. **(40 CFR 60.49b(j))**
   b. Percent sulfur content of the fuel oil certifying that the fuel oil meets 0.44%. **(40 CFR 60.49b(r))**

5.4. The permittee shall submit a Quality Improvement Plan (QIP) if excess NOx emissions are observed twelve times in a 6-month reporting period. **(R 336.1213(3))**

6.5. For NOx, quarterly reporting for the CEMS, in the form of a Summary Report, containing an Excess Emission Summary and Continuous Monitoring Systems Performance Summary, if the total duration of the excess emissions for the quarter is less than 1% of the total operating time for the quarter and the total CEMS downtime for the quarter is less than 5% of the total operating time for the quarter, pursuant to Condition 26 of Part A. Due May 1 for reporting period January

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1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31.[2] **(40 CFR Part 60 Subpart A 60.7)**

~~7.~~6. For NOx, quarterly reporting for the CEMS, containing the following: 1) A Summary Report, containing an Excess Emission Summary and Continuous Monitoring Systems Performance Summary, and 2) An Excess Emission Report and Continuous Monitoring Systems Out of Service Report, if the total duration of the excess emissions for the quarter is 1% or greater of the total operating time for the quarter or the total CEMS downtime for the quarter is 5% or greater of the total operating time for the quarter, pursuant to Condition 26 of Part A. Due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31.[2] **(40 CFR Part 60 Subpart A 60.7)**

~~8.~~7. For oxygen, quarterly reporting for the CEMS, in the form of a Continuous Monitoring System Performance Summary if the total CEMS downtime for the quarter is less than 5% of the total operating time for the quarter, and a Monitoring Systems Performance Summary and a Continuous Monitoring Systems Out of Service Report, if the total CEMS downtime for the quarter is 5% or greater of the total operating time for the quarter, pursuant to Condition 26 of Part A. Due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31.[2] **(40 CFR Part 60 Subpart A 60.7)**

~~9.~~8. Quarterly reporting for the CGAs conducted on the NOx and oxygen span gases in the form of a CGA Data Sheet. Due May 1 for reporting period January 1 to March 31, August 1 for reporting period April 1 to June 30, November 1 for reporting period July 1 to September 30, and February 1 for reporting period October 1 to December 31.[2] **(40 CFR Part 60 Appendix F)**

~~10.~~9. Reporting in the form of a summary report on the test results of the RATA conducted on the NOx and oxygen CEMS. Due 45 days after the quarter in which it is conducted.[2] **(40 CFR Part 60 Appendix F)**

~~11.~~10. For any required stack testing the permittee shall submit a test protocol to the AQD District Supervisor and the Technical Programs Unit at least 30 days prior to the scheduled test date. **(R 336.1213(3))**

~~12.~~11. The permittee shall notify the District Supervisor and the Technical Programs Unit no less than 7 days prior to the anticipated stack test date. **(R 336.2001(3))**

~~13.~~12. The permittee shall submit a complete stack test report of the test results to the District Supervisor and the Technical Programs Unit within 60 days following the last date of the test. **(R 336.2001(4))**

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBOILER#9	64.2[2]	115.0[2]	**R 336.1201(3)**

IX. OTHER REQUIREMENT(S)

1. The zero (or low-level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts of the NOx CEM shall be verified at least once each calendar day by the Data Acquisition and Handling System (DAHS). The zero and span shall, as a minimum, be adjusted whenever the 24-hour zero drift or 24-hour span drift exceeds two times the limits of the applicable performance specifications in 40 CFR Part 60 Appendix B. The system must allow the amount of excess zero and span drift measured at the 24-hour interval checks to be recorded and quantified, whenever specified. **(40 CFR 60.13(d)(1))**

2. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as follows: **(40 CFR 60.13(e))**

3. All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. **(40 CFR 60.13(e)(2))**

4. The permittee shall comply with the requirements of 40 CFR Part 60 Subparts A and Db. **(R 336.1213(3))**

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

EUK1MACHINE
EMISSION UNIT CONDITIONS

DESCRIPTION

K1 paperboard machine with in-line paperboard coating process. It includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, bar coater, ~~air knife~~ curtain coater, six drying ovens, starch preparation and handling equipment, and starch application equipment.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	41.4 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.3	**R 336.1225** **R 336.1702(a)**
2. Formaldehyde (CAS No. 50-00-0)	3,934.1 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
3. Acetaldehyde (CAS No. 75-07-0)	12, 841.4 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
4. Acetaldehyde (CAS No. 75-07-0)	39.8 lb/day[1]	Calendar Day	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.5	**R 336.1225**
5. Acrylonitrile (CAS No. 107-13-1)	58.9 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
6. Acrylamide (CAS No. 79-06-1)	240.0 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK1MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225(3)**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC content of coating	0.5 lb/gal (minus water)* as applied[2]	Instantaneous	EUK1MACHINE	SC V.1 SC VI.2	**R 336.1702(a)**

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

2. The permittee shall not operate the starch cooker unless the water separator is operating properly.[2] **(R 336.1702(a))**

3. ~~The permittee shall not operate the air knife unless the Saveall Pan and mist eliminator are operating properly.[2] (R 336.1702(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. Upon request from the District Supervisor, the permittee shall verify the VOC content of any material by testing at owner's expense, in accordance with Department requirements. The test shall use a method approved by the District Supervisor as appropriate for the nature of the material to be tested. If the test results and the formulation values should differ, the permittee shall use the test results to determine compliance.[2] **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/ recordkeeping special condition.[2] **(R 336.1225, R 336.1702(a))**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each toxic air contaminant. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information on a calendar month basis for EUK1MACHINE:
   a. Pounds or tons of each VOC containing material used and reclaimed.
   b. VOC content (minus water and with water) of each material as applied/used.
   c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
   d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1702(a))**

4. The permittee shall keep the following information on a calendar month basis for EUK1MACHINE:
   a. Pounds or tons (with water) of each Formaldehyde (CAS No. 50-00-0), Acrylonitrile (CAS No. 107-13-1) and Acrylamide (CAS No. 79-06-1) containing material used and reclaimed.
   b. Formaldehyde (CAS No. 50-00-0), Acrylonitrile (CAS No. 107-13-1) and Acrylamide (CAS No. 79-06-1) content (with water) in pounds per gallon of each material used.
   c. Formaldehyde (CAS No. 50-00-0), Acrylonitrile (CAS No. 107-13-1) and Acrylamide (CAS No. 79-06-1) mass emission calculations determining the monthly emission rate in pounds per calendar month.
   d. Formaldehyde (CAS No. 50-00-0), Acrylonitrile (CAS No. 107-13-1) and Acrylamide (CAS No. 79-06-1) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[1] **(R 336.1225)**

5. The permittee shall keep the following information on a calendar day basis for EUK1MACHINE:
   a. Pounds (with water) of Acetaldehyde (CAS No. 75-07-0) containing material used and reclaimed.
   b. The Acetaldehyde (CAS No. 75-07-0) content (with water) in pounds per gallon of each material used.
   c. Acetaldehyde (CAS No. 75-07-0) mass emission calculations determining the daily emission rate in pounds per calendar day.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[1] **(R 336.1225)**

6. The permittee shall calculate the mass emissions of Acetaldehyde (CAS No. 75-07-0), determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month for EUK1MACHINE. **(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. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal.[1] **(R 336.1225(4))**

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVD1	43.0 x 57.5[2]	52.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVD2	43.0 x 57.5[2]	52.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVD3	43.0 x 57.5[2]	51.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVOVEN1	36.0 x 32.0[2]	58.4[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVOVEN2	30.0 x 20.0[2]	58.4[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

NA

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

EUK2AMU
EMISSION UNIT CONDITIONS

DESCRIPTION

Natural gas Air Makeup Units (AMU) installed on K2 portion of the facility with a combined heat capacity of 106.5 MMBtu/hr. This equipment is currently under construction.

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Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	6.6 tpy*	12-month rolling time period as determined at the end of each calendar month	EUAMU	SC VI.2	R 336.1205, 40 CFR 52.21(a)(2)(iv)
* Established based on an emission factor of 50 lb/MMCF natural gas burned and the natural gas usage limit in SC II.1					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural Gas	262.8MMCF/yr	12-month rolling time period as determined at the end of each calendar month	EUAMU	SC VI.1	R 336.1205(1)(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

1. After initial startup of EUAMU, t~~T~~he permittee shall monitor and record, in a satisfactory manner, natural gas usage in EUAMU on a monthly and 12-month rolling time period basis. **(R 336.1205)**

2. After initial startup of EUAMU, t~~T~~he permittee shall calculate the total NOx emissions from EUAMU on a monthly and 12-month rolling time period basis. This calculation will be based upon the fuel usage and the emission factor of 50 lb/MMCF natural gas burned. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205)**

VII. REPORTING

1.
NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

EUK2COOLINGTW1
EMISSION UNIT CONDITIONS

DESCRIPTION

Utility Cooling Tower- 6,227 gallon per minute water flowrate on the K2 paperboard machine. This equipment is under construction.

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Flexible Group ID: FGPROJECT2019

POLLUTION CONTROL EQUIPMENT

Drift eliminator

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUCOOLINGTW1 if total dissolved solids (TDS) exceeds 860 ppmw. **(R 336.1205, R 336.1702, R 336.1910, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not install a cooling tower which exceeds 6,227 gpm for EUCOOLINGTW1. **(R 336.1205, R 336.1910, 40 CFR 52.21(c) & (d))**

2. The permittee shall equip and maintain EUCOOLTWR with drift eliminators that have a vendor-certified maximum drift rate of 0.001 percent or less. **(R 336.1901)**

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. After initial startup, t~~T~~he permittee shall continuously monitor the TDS for each tower and maintain an automatic blowdown system to prevent the TDS from exceeding the limit in SC III.1. The permittee shall maintain records of any maintenance, calibration, or setting changes for the blow-down systems as they occur. **(R 336.1205, R 336.1910, 40 CFR 52.21(c) & (d))**

2. The permittee shall maintain the vendor certification of the maximum drift rate for EUCOOLTWR. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1901)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVUTILCOOL1	144	66	40 CFR 52.21(c) & (d)
2. SVUTILCOOL2	144	66	40 CFR 52.21(c) & (d)
3. SVUTILCOOL3	144	66	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

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

EUK2STARCH
EMISSION UNIT CONDITIONS

DESCRIPTION

10,600 cubic feet silo, starch preparation and handling equipment, and starch application equipment. Cylindrical jacket with conical discharge, includes dust bin vent filter. This equipment is under construction.

Flexible Group ID: FGPROJECT2019

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. There shall be no outdoor visible emissions from EUSTARCH. **(R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUSTARCH unless the bin filters on the silos are installed, maintained, and operated in a satisfactory manner. **(R 336.1205, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

2. The permittee shall not operate EUSTARCH unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 180 days after installation of EUSTARCH, and is implemented and maintained. The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment and shall 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.
   d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions.

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 90 days after such an event occurs. The permittee shall also amend the MAP within 90 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 336.1911)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. After initial startup, ~~T~~the permittee shall maintain records of the inspections and replacements of the bin filters on the silos.
   (R 336.1205, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

VII. REPORTING

1. Within 30 days after completion of the installation of EUSTARCH, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing of the completion of installation. **(R 336.1201(7), 40 CFR 60.49b(a))**

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSTARCHSIL	40	80*	**40 CFR 52.21(c) & (d)**
*Horizontal stack exhaust			

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

EUK3MACHINE
EMISSION UNIT CONDITIONS

DESCRIPTION

K3 paperboard machine with in-line paperboard coating process. It includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, a bar coater, an air-knife coater, drying ovens, starch preparation and handling equipment, and starch application equipment.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	20.8 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.3	**R 336.1225** **R 336.1702(a)**
2. Formaldehyde (CAS No. 50-00-0)	736.3 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
3. Acetaldehyde (CAS No. 75-07-0)	2,367.9 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**
4. Acetaldehyde (CAS No. 75-07-0)	8.2 lb/day[1]	Calendar Day	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.5	**R 336.1225**
5. Acrylonitrile (CAS No. 107-13-1)	11.0 lb/year[1]	12-month rolling time period as determined at the end of each calendar month	EUK3MACHINE	SC VI.1 SC VI.2 SC VI.4	**R 336.1225**

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC content of coating	0.5 lb/gal (minus water)* as applied[2]	Instantaneous	EUK3MACHINE	SC V.1 SC VI.2	**R 336.1702(a)**

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

2. The permittee shall not operate the air knife coater unless the Saveall Pan is operating properly.[2] **(R 336.1702(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. Upon request from the District Supervisor, the permittee shall verify the VOC content of any material by testing at owner's expense, in accordance with Department requirements. The test shall use a method approved by the District Supervisor as appropriate for the nature of the material to be tested. If the test results and the formulation values should differ, the permittee shall use the test results to determine compliance.[2] **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring / recordkeeping special condition.[2] **(R 336.1225, R 336.1702(a))**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each toxic air contaminant. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1225, R 336.1702(a))**

3. The permittee shall keep the following information on a calendar month basis for EUK3MACHINE:
   a. Pounds or tons of each VOC containing material used and reclaimed.
   b. VOC content (minus water and with water) of each material as applied/used.
   c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
   d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1225, R 336.1702(a))**

4. The permittee shall keep the following information on a calendar month basis for EUK3MACHINE:
   a. Pounds or tons (with water) of each Formaldehyde (CAS No. 50-00-0) and Acrylonitrile (CAS No. 107-13-1) containing material used and reclaimed.
   b. Formaldehyde (CAS No. 50-00-0) and Acrylonitrile (CAS No. 107-13-1) content (with water) in pounds per gallon of each material used.
   c. Formaldehyde (CAS No. 50-00-0) and Acrylonitrile (CAS No. 107-13-1) mass emission calculations determining the monthly emission rate in pounds per calendar month.
   d. Formaldehyde (CAS No. 50-00-0) and Acrylonitrile (CAS No. 107-13-1) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[1] **(R 336.1225)**

5. The permittee shall keep the following information on a calendar day basis for EUK3MACHINE:
   a. Pounds (with water) of Acetaldehyde (CAS No. 75-07-0) containing material used and reclaimed.
   b. The Acetaldehyde (CAS No. 75-07-0) content (with water) in pounds per gallon of each material used.

c. Acetaldehyde (CAS No. 75-07-0) mass emission calculations determining the daily emission rate in pounds per calendar day.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[1] **(R 336.1225)**

6. The permittee shall calculate the mass emissions of Acetaldehyde (CAS No. 75-07-0), determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month for EUK3MACHINE. **(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. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal.[1] **(R 336.1225(4))**

See Appendix 1.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVK3COATING	20.0[2]	51.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVK3WETEND1	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVK3WETEND2	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVK3DRYER1	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVK3DRYER2	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
6. SVK3DRYER3	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
7. SVK3DRYER4	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
8. SVK3DRYER5	48.0[2]	59.0[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

NA

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

EUCONVERTDEPT
EMISSION UNIT CONDITIONS

DESCRIPTION

Off-line paperboard coater located in the converting department.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The volatile organic compound emission rate shall not exceed 2.9 pounds per gallon of coating, minus water, as applied.[2] **(R 336.1213(2)(d), R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a vendor certified formulation sheet for each coating, ink, and reducer on file. At a minimum, each certified formulation sheet shall show the chemical composition, VOC content and HAP content of the coating, ink, or reducer. Vendor formulation sheets shall be determined using Federal Reference Test Method 24 or 24A or an alternate test method that has been approved as acceptable by EPA and AQD. **(R 336.1213(3))**

2. The permittee shall monitor and record the volatile organic compound content, in pounds per gallon, minus water as applied, of each coating used. **(R 336.1213(3))**

See Appendix 1.4

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 1.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

EU01GASTANK
EMISSION UNIT CONDITIONS

DESCRIPTION

An existing stationary gasoline dispensing facility located at an area source of hazardous air pollutant that has a maximum monthly gasoline throughput of <10,000 gallons.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not allow gasoline to be handled in a manner that would result in a vapor release to the atmosphere for extended periods of time. **(40 CFR 63.11116(a))**

2. The permittee shall minimize gasoline spills. **(40 CFR 63.11116(a)(1))**

3. Spills shall be cleaned up as expeditiously as practicable. **(40 CFR 63/11116(a)(2))**

4. The permittee shall cover all open gasoline containers and all gasoline storage tank fill pipes with a gasketed seal when not in use. **(40 CFR 63.11116(a)(3))**
   a. Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F are considered acceptable for compliance with condition III.4.

5. Facilities are not required to submit notifications or reports, but must have gasoline throughput records available upon request by USEPA or ~~MDEQ~~EGLE.

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 keep a record of gasoline throughput to be able to demonstrate that monthly throughput is less than 10,000 gallons and such record must be made available to USEPA or to MDEQ with 24 hours of a request. **(40 CFR 63.11116(b))**

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 applicable provisions of the Gasoline Distribution GACT as specified in 40 CFR Part 63, Subpart CCCCCC. **(40 CFR Part 63 Subpart CCCCCC)**

2. If the permittee's affected source's throughput ever exceeds an applicable throughput threshold, then permittee's affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold. **(40 CFR 63.11111(i))**

Footnotes:

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

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGRULE290	Any emission unit that is exempt from Rule 201 pursuant to Rule 290.	EUCONVERTETHYLAC-ETATE EUMILLCYCLONES
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201, pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANERS
FG-RICE-MACT4Z	Each existing emergency stationary reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ, 63.6590(a)(1) and is exempt from the requirements of Rule 201 pursuant to Rules 282(b) or 285(g).	EUFIREPUMP
FGK2MACHINE	2,400 tons per day, paperboard machine with in-line paperboard coating process. This emission unit includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, and curtain coater and drying ovens.	EUK2MACHINE, EUK2DRYER1, EUK2DRYER2, EUK2DRYER3, EUDRYER4, EUK2DRYER5, EUK2DRYER6, EUK2DRYER7, EUK2CALENDARHEAT1 EUK2CALENDARHEAT2
FGBOILERS10-11	Two 311 MMBtu/hr natural gas fired boilers used to heat steam for dryer and hot water to be used on the paper machine.	EUBOILER#10, EUBOILER#11
FGPROJECT2019	All new equipment being permitted in the 2019 project.	EUK2MACHINE, EUK2DRYER1, EUK2DRYER2, EUK2DRYER3, EUK2DRYER4, EUK2DRYER5, EUK2DRYER6, EUK2DRYER7, EUK2COOLINGTW1, , EUK2STARCH, EUBOILER#10, EUBOILER#11, EUK2CALENDARHEAT1 EUK2CALENDARHEAT2

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FG-RULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that is exempt from Rule 201 pursuant to Rule 290.

Emission Units: EUCONVERTETHYLACETATE, ~~EUMILLCYCLONES~~

POLLUTION CONTROL EQUIPMENT

~~EUMILLCYCLONES - Cyclones~~

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(a)(i))**

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

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

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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 DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor **(R 336.1213(3))**:
   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
   d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
   e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information **(R 336.1213(3))**:
   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
   b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate**. (R 336.1213(3))**

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

VII. REPORTING

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGCOLDCLEANERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUCOLDCLEANERS

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(h))**
   b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**

2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
   a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
   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(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 1.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FG-RICE-MACT4Z
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each existing emergency stationary reciprocating internal combustion engine (RICE) as identified within 40 CFR Part 63, Subpart ZZZZ, 63.6590(a)(1) and is exempt from the requirements of Rule 201 pursuant to Rules 282(b) or 285(g).

Compliance date – May 3, 2013, for CI Engines

Emission Unit: EUFIREPUMP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain any affected RICE, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**

2. The permittee shall operate each existing emergency stationary according to the requirements in paragraphs below:
   a. There is no time limit on the use of emergency stationary RICE in emergency situations. **(40 CFR 63.6640(f)(1))**
   b. The permittee may operate each emergency stationary RICE for a maximum of 100 hours per calendar year for any of the following purposes-:
      i. For maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, the regional transmission authority or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(i))**
   c. The permittee may operate each emergency stationary RICE up to 50 hours per year in non-emergency situations, but these 50 hours of operation are counted towards the 100 hours per calendar year operation provided for maintenance and testing SC III.2.b. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, 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. **(40 CFR 63.6640(f)(4))**

3. The permittee shall comply with the following requirements, for each existing emergency stationary RICE, by the applicable compliance date **(40 CFR 63.6603 and Table 2d)**:
   a. For CI engines:
      i. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.4.

ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6603 and as listed in SC III.2. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i) for CI engines or i40 CFR 63.6625(j) for SI engines. **(40 CFR 63.6625(i) and (j))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each existing emergency stationary RICE with a non-resettable hour meter. **(40 CFR 63.6625(f))**

2. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop you own maintenance plan which must provide to the extent practicable for the maintenance and operation for the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a), Table 6)**

V. TESTING/SAMPLING

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

1. If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content. **(40 CFR 63.6625(i))**

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 63.6655 (except 63.6655(c)). **(40 CFR 63.6655(a))**

2. The permittee shall maintain, at a minimum, the following records by the applicable compliance date:
   a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart ZZZZ and the documentation supporting each notification and report. **(40 CFR 63.6655(a)(1))**
   b. Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(2))**
   c. Records of all required maintenance performed on the air pollution control and monitoring equipment. **(40 CFR 63.6655(a)(4))**
   d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.6655(a)(5))**

3. The permittee shall keep records as required in SC IV.2 to show continuous compliance with each emission or operating limit that applies. **(40 CFR 63.6655(d), 63.6660)**

4. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

5. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document **(40 CFR 63.6655(f), 40 CFR 63.6660)**:
   a. How many hours are spent for emergency operation.
   b. What classified the operation as an emergency.
   c. How many hours are spent for non-emergency operation.

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 applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ as they apply to FG-RICE-MACT4Z. The permittee may choose an alternative compliance method not listed in FG-RICE-MACT4Z by complying with all applicable provisions required by Subpart ZZZZ for the compliance option chosen. **(40 CFR Part 70.6(9), 40 CFR Part 63.9(j), 40 CFR Part 63 Subparts A and ZZZZ)**

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

FGK2MACHINE
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

2,400 tons per day, paperboard machine with in-line paperboard coating process. This emission unit includes the wet end process, steam heated drying cylinders, coating preparation and handling equipment, and curtain coater and drying ovens. These emission units are under construction.

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Emission Unit: EUK2MACHINE, EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4, EUDRYER5, EUDRYER6, EUDRYER7, EUCALENDARHEAT1, EUCALENDARHEAT2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	29.3 tpy[a]	12-month rolling time period as determined at the end of each calendar month	FGK2MACHINE	SC VI.2, SC VI.3	R 336.1702(a), R 336.1205(3)
2. NOx	16.5 tpy[b]	12-month rolling time period as determined at the end of each calendar month	FGK2MACHINE	SC VI.6	R 336.1205
3. Acetaldehyde[1]	5.685 lb/year	12-month rolling time period as determined at the end of each calendar month	FGK2MACHINE	SC VI.2, SC VI.3	R 336.1225(3)
4. Acrylamide[1]	116 lb/year	12-month rolling time period as determined at the end of each calendar month	FGK2MACHINE	SC VI.2, SC VI.3	R 336.1225(3)

[a] Established based on 0.0837 lb VOC per ton of paperboard produced plus 5.5 lb/MMCF of natural gas combusted. The annual amount of paperboard produced is limited in SC II.1 and the maximum heat capacities of all fuel combustion equipment in FGK2MACHINE was used.

[b] Established based on an emission factor of 50 lb/MMCF of natural gas burned and total maximum heat capacities of all the fuel combusting equipment in FGK2MACHINE. Compliance will be demonstrated based upon actual material usage.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Paperboard Produced[1]	657,000 tons/yr	12-month rolling time period as determined at the end of each calendar month	EUK2MACHINE	SC VI.3	R 336.1205, R 336.1225, R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall handle all VOC and/or HAP containing materials used in FGK2MACHINE in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install the dryers in FGK2MACHINE with a maximum capacity not to exceed the heat inputs listed in the table below. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910)**

EUDRYER1	27.6 MMBtu/hr
EUDRYER2	6.1 MMBtu/hr
EUDRYER3	7.6 MMBtu/hr
EUDRYER4	7.5 MMBtu/hr
EUDRYER5	7.6 MMBtu/hr
EUDRYER6	7.6 MMBtu/hr
EUDRYER7	7.6 MMBtu/hr
EUCALENDARHEAT1	2.8 MMBtu/hr
EUCALENDARHEAT2	2.8 MMBtu/hr

V. TESTING/SAMPLING

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

1. After startup is complete, ~~T~~the permittee shall verify the VOC content of any material used in FGK2MACHINE using federal Reference Test Method 24/24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24/24A and the formulation values should differ, the permittee shall use the Method 24/24A results to determine compliance. **(R 336.1205, R 336.1702(a), 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. After startup is complete, ~~T~~the permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring / recordkeeping special condition. **(R 336.1225, R 336.1702(a))**

2. After startup is complete, ~~T~~the permittee shall maintain a current listing from the manufacturer of the chemical composition of each material used in FGK2MACHINE, including the weight percent of each toxic air contaminant. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

3. After startup is complete, ~~T~~the permittee shall keep the following information on a monthly basis for EUK2MACHINE:
   a) Tons of paper produced on a monthly and 12-month rolling time period basis.
   b) Pounds or tons of each VOC containing material used and reclaimed.
   c) VOC content (minus water and with water) of each material as applied.
   d) Pounds or tons (with water) of each Acetaldehyde and Acrylamide containing material used and reclaimed. [1]
   e) Acetaldehyde and Acrylamide content (with water) in percent by weight of each material used. [1]
   f) VOC mass emission calculations determining the monthly emission rate in tons per calendar month using mass balance, or an alternative method acceptable to the AQD District Supervisor.
   g) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month using mass balance, or an alternative method acceptable to the AQD District Supervisor.

h) Acetaldehyde and Acrylamide mass emission calculations determining the monthly emission rate in pounds per calendar month using mass balance, or an alternative method acceptable to the AQD District Supervisor.[1]

i) Acetaldehyde and Acrylamide mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month using mass balance, or an alternative method acceptable to the AQD District Supervisor.[1]

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(a), R 336.1225)**

4. After startup is complete, ~~T~~the permittee shall keep a record of the amount of natural gas burned in FGK2MACHINE on a monthly and 12- month rolling time period basis. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205)**

5. After startup is complete, ~~T~~the permittee shall calculate the total NOx emissions from FGK2MACHINE on a monthly and 12-month rolling time period basis. The calculation shall be based upon the recorded amount of natural burned and 50 lb of NOx/MMCF of natural gas burned. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWETEND1	66	100	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVWETEND2	66	100	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVWETEND3	66	100	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVWETEND4	48	100	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVDRYERV1	44	100	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVDRYERV2	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
6. SVDRYERV3	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
7. SVDRYERV4	25	110	R 336.1225, 40 CFR 52.21(c) & (d)
8. SVDRYERV5	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
9. SVDRYERV6	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
10. SVDRYERV7	20	110	R 336.1225, 40 CFR 52.21(c) & (d)
11. SVCALENDAR1	16	50	R 336.1225, 40 CFR 52.21(c) & (d)

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
12. SVCALENDAR2	16	50	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

FGBOILERS10-11
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two 311 MMBtu/hr natural gas fired boiler used to heat steam for dryer and hot water to be used on the paper machine.

Emission Unit: EUBOILER#10, EUBOILER#11

POLLUTION CONTROL EQUIPMENT

Low-NOX Burners (LNB) and Flue Gas Recirculation (FGR)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO_x[a]	0.036 lb/MMBtu	Hourly	Each boiler in FGBOILERS10-11.	SC V.1	R 336.1205, 40 CFR 52.21(a)(2)(iv), 40 CFR 52.21(c) and (d), 40 CFR 60.44b(a)(1)
2. PM10[b]	0.004 lb/MMBtu	Hourly	Each boiler in FGBOILERS10-11.	SC V.1	R 336.1331, 40 CFR 52.21 (c) and (d)
3. PM2.5	0.004 lb/MMBtu	Hourly	Each boiler in FGBOILERS10- 11.	SC V.1	R 336.1331, 40 CFR 52.21 (c) and (d)

[a] Emission limit for NOx subsumes the Subpart Db requirement of 0.10 lb/MMBtu
[b] PMemissions restricted by PM10 emission limit

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in FGBOILERS10-11. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1702, 40 CFR 52.21(c) and (d), 40 CFR 52.21(a)(2)(iv), 40 CFR Part 60 Subpart Db)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUBOILER#10 or EUBOILER#11 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 180 days of initial startup, and is implemented and maintained for the respective boiler. The MAP shall, at a minimum, meet the manufacturer's written instructions for operating and maintaining the boiler and emission control equipment and shall 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.
d. A description of how emissions will be minimized during all startups, shutdowns and malfunctions

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 90 days after such an event occurs. The permittee shall also amend the MAP within 90 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, R 336.1912, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUBOILER#10 or EUBOILER#11 unless each boiler and emission control equipment for the respective boiler is maintained and operated according to the manufacturer's instructions and the MAP in SC III.1. **(R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))**

2. The permittee shall not install EUBOILER#10 or EUBOILER#11 with a heat capacity in excess of 311 MMBtu/hr per boiler. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, 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))**

1. Within 180 days after commencement of initial startup of each boiler in FGBOILERS10-11, the permittee shall verify NOX, PM10 and PM2.5 emission rates from FGBOILERS10-11 by testing at the owner's expense, in accordance with Department requirements. Testing for NOX shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. Testing for PM10 and PM2.5 shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.**R 336.1205, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.2(c) & (d))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required records 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 recordkeeping, reporting or notification special condition. **(R 336.1205, R 336.1702)**

2. The permittee shall maintain records from the fuel supplier which certify that the gaseous fuel burned in FGBOILERS10-11meets the definition of natural gas as defined in §60.41b and the applicable sulfur limit. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR Part 60 Subpart Db)**

3. The permittee shall maintain the manufacturer's written instructions for operating and maintaining each boiler in FGBOILERS10-11 and emission control equipment. The permittee shall maintain records of all maintenance performed on the boiler and emission control equipment. **(R 336.1205, R 336.1910, 40 CFR Part 60 Subpart Db)**

4. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:

   a. Compliance tests and any testing required under the special conditions of this permit;
   b. Verification of heat input capacity required to show compliance with SC IV.3.
   (R 336.1205(1), R 336.1224, R 336.1225, R 336.1301, R 336.1702(a), 40 CFR 52.21(c) and (d), 40 CFR 52.21(a)(2)(iv), CFR Part 60 Subpart Db)

VII. REPORTING

1. The owner or operator of each affected facility shall submit notification of the date of initial startup of EUBOILER#10 and EUBOILER#11, as provided by §60.7. This notification shall include the information specified in §60.49b. **(R 336.1201(7), 40 CFR 60.49b(a))**

Commented [LW6]: This notification has been completed.

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))**

Only include if there are any stack testing conditions

4. 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)

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. SVBLR10	63	110	R 336.1225, 40 CFR 52.21(c) and (d)
2. SVBLR11	63	110	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Db, as they apply to FGBOILERS10-11. **(40 CFR Part 60 Subparts A & Db)**

Footnotes:

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

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FGPROJECT2019
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All new equipment being permitted in the 2019 project.

Emission Unit: EUK2MACHINE, EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4, EUDRYER5, EUDRYER6, EUDRYER7, EUCOOLINGTW1, EUSTARCH, EUEUBOILER#10, EUBOILER#11, EUCALENDARHEAT1, EUCALENDARHEAT2

POLLUTION CONTROL EQUIPMENT

There is a bin filter on the silo. The Boilers are equipped with Low-NO_X Burners (LNB) and Flue Gas Recirculation (FGR).

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall implement the Odor Investigation Plan approved by AQD on June 4, 2020. The permittee shall submit a report of the results to the AQD Technical Programs Unit and District Office within 30 days of completing the odor investigation. **(R336.1901(b))**

2. Within 60 days of submitting the results report from the Odor Investigation Plan, the permittee shall submit a proposed Nuisance Minimization Plan for Odors and an implementation schedule to the AQD District Office Supervisor for approval. **R336.1901(b))**

3. The permittee shall not operate FGPROJECT2019 after Nuisance Minimization Plan as described in SC III.2 is submitted unless the plan is implemented in accordance with its terms. The Nuisance Minimization Plan shall, at minimum, include the following:
   a. Identification of the supervisory personnel responsible for overseeing the implementation of the plan,
   b. An identification of the sources of potential nuisance odor issues and how the odors from those sources will be minimized and monitored,
   c. A description of the items or conditions that shall be implemented as part of the plan,
   d. The timeline for making any physical or operational changes and the frequency of any associated inspections or monitoring,
   e. Proposed operation and data collection. Such data collection shall include the continued operation of the existing H2S Envirosuite stationary monitoring system for a minimum of twelve months following initial startup of process equipment in FGPROJECT2019. The data collected by the permittee must be made available to the Department upon request.
   f. A description of the corrective procedures or operational changes that shall be taken in the event of an elevated odor event.

After submission of the plan by the permittee, the AQD District Office Supervisor may request modifications to the plan. Within 30 days after a request by the AQD District Office Supervisor, the permittee shall submit proposed modifications to the plan for consideration by the Department. The permittee shall submit the Nuisance Minimization Plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the Nuisance Minimization Plan or amendments to the plan shall be considered approved. **(R336.1901(b))**

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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 The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1).The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal. **(R 336.1225(4))**[1]

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

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 1.1. Abbreviations and Acronyms

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

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
GC	General Condition	psig	Pounds per square inch gauge
gr	Grains	PeTE	Permanent Total Enclosure
HAP	Hazardous Air Pollutant	PTI	Permit to Install
Hg	Mercury	RACT	Reasonable Available Control Technology
hr	Hour	ROP	Renewable Operating Permit
HP	Horsepower	SC	Special Condition
H_2S	Hydrogen Sulfide	scf	Standard cubic feet
HVLP	High Volume Low Pressure *	sec	Seconds
ID	Identification (Number)	SCR	Selective Catalytic Reduction
IRSL	Initial Risk Screening Level	SO_2	Sulfur Dioxide
ITSL	Initial Threshold Screening Level	SRN	State Registration Number
LAER	Lowest Achievable Emission Rate	TAC	Toxic Air Contaminant
lb	Pound	Temp	Temperature
m	Meter	THC	Total Hydrocarbons
MACT	Maximum Achievable Control Technology	tpy	Tons per year
MAERS	Michigan Air Emissions Reporting System	µg	Microgram
MAP	Malfunction Abatement Plan	VE	Visible Emissions
~~MDEQ~~EGLE	Michigan Department of Environment, Great Lakes, and Energy~~al Quality~~	VOC	Volatile Organic Compounds
mg	Milligram	yr	Year
mm	Millimeter		

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

Appendix 1.2. Schedule of Compliance

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

Appendix 1.3. Monitoring Requirements

Monitoring Requirements for EUBOILER#8:

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EUBOILER#8 when firing residual fuel oil (residual fuel oil means fuel oil grades no. 3 through no. 6) unless an alternative format is approved by the AQD District Supervisor:

1. The permittee shall perform and record the results of a six-minute visible emission check of SVBOILER#8 immediately after each start-up occurrence and at least once per calendar day thereafter during maximum routine operating conditions.

2. If visible emissions are observed at start-up or during maximum routine operating conditions, the permittee shall then perform and record the results of a six-minute visible emission check of SVBOILER#8 at least once every 30 minutes thereafter, until visible emissions are no longer observable or until visible emissions are observable for more than two hours.

3. If visible emissions are still observable within two hours of the initial observance, the permittee shall proceed with the Malfunction Abatement Plan in Appendix 1.9 and perform and record the results of a Federal Reference Test Method 9 visible emission observation of SVBOILER#8 within 24 hours; or the permittee shall cease firing of fuel oil and revert to firing natural gas until corrective action measures have been implemented.

4. If a Federal Reference Test Method 9 visible emission observation is performed and indicates a violation of the opacity standard specified in R 336.1301 (See General Condition 11), the permittee shall immediately notify the AQD as required in General Condition No. 21 of Part A.

5. If a Federal Reference Test Method 9 visible emission observation is performed and indicates that the opacity from EUBOILER#8 is in compliance with R 336.1301, then the permittee may continue to fire residual fuel oil and cease making visible emission checks until such time that residual fuel oil start-up occurs again.

NOTE: The purpose of the six-minute visible emission check is to verify (yes or no) whether visible emissions are observed. Therefore, the permittee should record a positive or negative response for each visible emission check that is performed.

Appendix 1.4. Recordkeeping

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

Appendix 1.5. Testing Procedures

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

Appendix 1.6. 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-B1678-2010. 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-B1678-2010b is being reissued as Source-Wide PTI No. MI-PTI-B1678-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
MI-PTI-B1678-2010b	NA	Facility-wide PTI.	Source-wide
99-11	201100148	Increase VOC emissions for EUK1Machine and EUK3MACHINE.	EUK1MACHINE EUK3MACHINE
99-11A	201300207	Add the use of new coating materials in EUK1MACHINE, which may emit acrylamide.	EUK1MACHINE EUK3MACHINE
NA	201400040	Move EUWEBPRESS#6 to Section 2 and removal of duplicate CAIR NO_x Budget Permit in Section 2.	EUWEBPRESS#6 CAIR NOx Budget Permit
82-14	NA	Modify the material limit options for the inks and coatings for the presses.	FGWEBPRESSES

Appendix 1.7. Emission Calculations

EUBOILER#9:

The permittee may use the following calculations and methods or an alternative method, as approved by the AQD District Supervisor, for determining the annual capacity factor as described for EUBOILER#9:

1. The Permittee shall record the total amount of each fuel consumed by EUBOILER#9 for each calendar day.

2. The permittee shall calculate the total amount of each fuel consumed by EUBOILER#9 for each calendar month.

3. For each fuel consumed, the permittee shall convert the fuel usage to an actual heat input value (MMBTU) for each calendar month by utilizing AP-42 emission factors. (i.e., for natural gas usage, (MCF x 1000 BTU/CF) / 1000 = MMBTU)

4. For each fuel consumed, the permittee shall calculate the 12-month rolling average annual capacity factor by dividing the 12-month average actual total heat input value (MMBTU) by the total heat input capacity of the boiler (226.7 million BTU/hr x 8760 hours for natural gas and 217.1 MMBTU/HR x 8760 hours for fuel oil).

The permittee may use the following calculations and methods or an alternative method, as approved by the district supervisor, for determining compliance with the emission limits the as described for EUBOILER#9.

1. The permittee shall calculate the 24-hour average pounds of NOx emitted per million BTUs of heat input for EUBOILER#9 by dividing the total of the hourly lb/MMBTU by 24 hours per day.

Appendix 1.8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the ~~MDEQ~~EGLE, AQD, Report Certification form (EQP 5736) and ~~MDEQ~~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 1.9 Malfunction Abatement Plan

Malfunction Abatement Plan for EUBOILER#8:

If the opacity exceeds the limits set forth in General Requirement 11, or if visible emissions are observed for more than two hours using the methods set forth in Appendix 1.3, the permittee shall implement the following procedures:

1. Determine the cause of the visible emissions within four hours of discovery.
2. Identify possible corrective measures within eight hours of discovery.
3. Implement the most practically feasible corrective measure which will reduce/eliminate the visible emissions within 48 hours of discovery.
4. Stop firing residual fuel oil and revert to firing natural gas until corrective action measures have been implemented.

DEQ

Michigan Department Of Environmental Quality
Air Quality Division

CAIR Ozone Nitrogen Oxide Budget Permit
Permit No. MI-NOO-10698-2015

Permittee	Graphic Packaging International, Inc.
Address	1500 North Pitcher Street, Kalamazoo, Michigan
SRN	B1678
ORIS code	10698
Issue Date	April 15, 2015
Expiration	This permit shall expire when the Facility's ROP expires in accordance with Air Pollution Control Rule 336.1821.
ROP No.	MI-ROP-B1678-2015

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1803.

This permit incorporates automatically, upon recordation by the USEPA Administrator in accordance with Air Pollution Control Rule 336.1822, 336.1823, and 336.1834 every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx Budget unit(s) covered by the permit.

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
EUBOILER#8	X Stationary Boiler	☐ Combined Cycle System	☐ Combustion Turbine	☐ Other

Permit Application:

CAIR Ozone NOX Season Permit application submitted August 5, 2014

Standard Requirements

(a) **Permit Requirements**.

(1) The CAIR designated representative of each CAIR NOX source required to have a Renewable Operating Permit (ROP) and each CAIR NOX unit required to have a ROP at the source shall:

(i) Submit to the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) a complete CAIR permit application under R 336.1821(3) in accordance with the deadlines specified in 40 CFR 97.321; and
(ii) Submit in a timely manner any supplemental information that the MDEQ-AQD determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NOX source required to have a ROP and each CAIR NOX unit required to have a ROP at the source shall have a CAIR permit issued by the MDEQ-AQD under subpart CCCC of 40 CFR part 97 for the source and operate the source and the unit in compliance with such CAIR permit.

(b) **Monitoring, Reporting, and Recordkeeping Requirements.**

(1) The owners and operators, and the CAIR designated representative, of each CAIR NOX source and each CAIR NOX unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subpart HHHH of 40 CFR part 97.

(2) The emissions measurements recorded and reported in accordance with subpart HHHH of 40 CFR part 97 shall be used to determine compliance by each CAIR NOX source with the CAIR NOX emissions limitation under paragraph (c) of this permit.

(c) **Nitrogen Oxides Emission Requirements.**

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NOX source and each CAIR NOX unit at the source shall hold, in the source's compliance account, CAIR NOX allowances available for compliance deductions for the control period under 40 CFR 97.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NOX units at the source, as determined in accordance with subpart HHHH of 40 CFR part 97.

(2) A CAIR NOX unit shall be subject to the requirements under paragraph (c)(1) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.370(b)(1), (2), (3) or (7) and for each control period thereafter.

(3) A CAIR NOX allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of this permit, for a control period in a calendar year before the year for which the CAIR NOX allowance was allocated.

(4) CAIR NOX allowances shall be held in, deducted from, or transferred into or among CAIR NOX Allowance Tracking System accounts in accordance with subparts EEEE, FFFF, GGGG, or IIII of 40 CFR part 97.

(5) A CAIR Ozone NOX Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR Ozone NOX Season Trading Program. No provision of the CAIR Ozone NOX Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under § 97.305 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(6) A CAIR NOX allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of 40 CFR part 97, every allocation, transfer, or deduction of a CAIR NOX allowance to or from a CAIR NOX source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) **Excess Emissions Requirements.**

If a CAIR NOX source emits nitrogen oxides during any control period in excess of the CAIR NOX emissions limitation, then:

(1) The owners and operators of the source and each CAIR NOX unit at the source shall surrender the CAIR NOX allowances required for deduction under 40 CFR 97.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, the Clean Air Act, and applicable State rules.

(e) **Recordkeeping and Reporting Requirements.**

(1) Unless otherwise provided, the owners and operators of the CAIR NOX source and each CAIR NOX unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the MDEQ-AQD or the Administrator.

(i) The certificate of representation under § 97.313 for the CAIR designated representative for the source and each CAIR NOX unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under § 97.313 changing the CAIR designated representative.
(ii) All emissions monitoring information, in accordance with subpart HHHH of 40 CFR part 97.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NOX Ozone Trading Program.
(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NOX Ozone Trading Program or to demonstrate compliance with the requirements of the CAIR NOX Ozone Trading Program.

(2) The CAIR designated representative of a CAIR NOX source and each CAIR NOX unit at the source shall submit the reports required under the CAIR NOX Ozone Trading Program, including those under subpart HHHH of 40 CFR part 97.

(f) **Liability.**

(1) Each CAIR NOX source and each CAIR NOX unit shall meet the requirements of the CAIR NOX Ozone Trading Program.

(2) Any provision of the CAIR NOX Ozone Trading Program that applies to a CAIR NOX source or the CAIR designated representative of a CAIR NOX source shall also apply to the owners and operators of such source and of the CAIR NOX units at the source.

(3) Any provision of the CAIR NOX Ozone Trading Program that applies to a CAIR NOX unit or the CAIR designated representative of a CAIR NOX unit shall also apply to the owners and operators of such unit.

(g) **Effect on Other Authorities.**

No provision of the CAIR NOX Ozone Trading Program, a CAIR permit application, a CAIR permit, or an exemption under § 97.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated

~~representative, of a CAIR NOX source or CAIR NOX unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.~~

SECTION 2 - CARTON PLANT

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), R336.1214a(5))**
- Those conditions that are hereby incorporated in 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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
    b. A limit specified by an applicable federal new source performance standard.

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

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

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).[2] **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP **(R 336.1213(3)(c))**:
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:

a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

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

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

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
    d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.

37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. [2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. [2] **(R 336.1201(8) Section 5510 of Act 451)**

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDNRE. [2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, ~~MDEQ~~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:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. The stationary source-wide, Section 1 and Section 2 combined, emission rate of an individual HAP shall be less than 9.9 tons per 12-month rolling time period. **(R 336.1213(2))**

2. The stationary source-wide, Section 1 and Section 2 combined, emission rate of total combined HAPs shall be less than 24.9 tons per 12-month rolling time period. **(R 336.1213(2))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall calculate and record the stationary source-wide, Section 1 and Section 2 combined, emission rates, in tons, for each single HAP and total combined HAPs for each calendar month and each 12-month rolling time period, as determined at the end of each calendar month. **(R 336.1213(3))**

See Appendix 2.4

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 2.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). **(R 336.1213(4)(c))**

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUWEBPRESS#1	Ultraviolet cured web offset lithographic printing press with in-line flexographic single roller coater and video jet printer.	01-01-89 08-28-14	FGWEBPRESSES
EUWEBPRESS#2	Ultraviolet cured web offset lithographic printing press with in-line flexographic single roller coater and video jet printer.	01-01-89 08-28-14	FGWEBPRESSES
EUWEBPRESS#3	Ultraviolet cured web offset lithographic printing press with in-line flexographic single roller coater and video jet printer.	01-01-89 08-28-14	FGWEBPRESSES
EUWEBPRESS#4	An 8-color 42 inch web litho (offset) printing process. The coatings applied on the press will be cured in a Flexo dryer. The process also includes an ultraviolet dryer to cure ultraviolet inks.	08-29-08 08-28-14	FGWEBPRESSES
EUWEBPRESS#5	An 8-color 42 inch web litho (offset) printing process. The coatings applied on the press will be cured in a Flexo dryer.	08-29-08 08-28-14	FGWEBPRESSES
EUWEBPRESS#6	One ultraviolet cured web offset lithographic printing press with in-line flexographic single roller coater.	10-05-11 08-28-14	FGWEBPRESSES
EUGLUER#1	Gluer used to apply adhesive.	01-01-89 NA	FGR290
EUGLUER#2	Gluer used to apply adhesive.	01-01-89 NA	FGR290
EUGLUER#3	Gluer used to apply adhesive.	09-01-09 NA	FGR290
EUGLUER#4	Gluer used to apply adhesive.	09-01-09 NA	FGR290
EUGLUER#5	Gluer used to apply adhesive.	09-01-09 NA	FGR290
EUGLUER#6	Gluer used to apply adhesive.	01-01-10 NA	FGR290
EUGLUER#7	Gluer used to apply adhesive.	05-01-12 NA	FGR290
EUGLUER#8	Gluer used to apply adhesive.	02/01/2019	FGR290

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSILICONE	Application of food-grade silicone to palletizer tables	11/2012	FGR290
EUCARTON290ETHAC	Ethyl acetate used in the carton plant to clean.	01-01-89 NA	FGR290
EUCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201, pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	<07-01-79 >07-01-79	FGCOLDCLEANERS

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGWEBPRESSES	Six heatset, webfed offset lithographic printing presses with in-line flexographic single roller coaters and video jet printers; ultraviolet cured. All of the presses are manual wash.	EUWEBPRESS#1 EUWEBPRESS#2 EUWEBPRESS#3 EUWEBPRESS#4 EUWEBPRESS#5 EUWEBPRESS#6
FGRULE290	Any emission unit that is exempt from Rule 201 pursuant to Rule 290.	EUGLUER#1 EUGLUER#2 EUGLUER#3 EUGLUER#4 EUGLUER#5 EUGLUER#6 EUGLUER#7 EUGLUER#8 EUCARTON290ETHAC EUSILICONE
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201, pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANERS

FGWEBPRESSES
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Six heatset, webfed, offset lithographic printing presses with in-line flexographic single roller coaters and video jet printers; ultraviolet cured. All of the presses are manual wash.

Emission Units: EUWEBPRESS#1, EUWEBPRESS#2, EUWEBPRESS#3, EUWEBPRESS#4, EUWEBPRESS#5, EUWEBPRESS#6

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	9.9 pph[2]	Test protocol	EUWEBPRESS#1, EUWEBPRESS#2, EUWEBPRESS#3 combined	SC VI.1, 2, and 4	**R 336.1702(a)**
2. VOC	41.8 tons per year[2]	Per 12 month rolling time period as determined at the end of each calendar month	EUWEBPRESS#1, EUWEBPRESS#2, EUWEBPRESS#3 combined	SC VI.1, 2, and 4	**R 336.1225 R 336.1702(a)**
3. VOC	26.0 tons per year[2]	Per 12 month rolling time period as determined at the end of each calendar month	EUWEBPRESS#4, EUWEBPRESS#5 combined	SC VI.1, 2, and 4	**R 336.1225 R 336.1702(a)**
4. VOC	13.5 tons per year[2]	Per 12 month rolling time period as determined at the end of each calendar month	EUWEBPRESS#6	SC VI.1, 2, and 4	**R 336.1225 R 336.1702(a)**

*Test protocol shall specify averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC content of the fountain solution	5.0% by weight, as applied and no alcohol*[2]	Instantaneous	Each press in FGWEBPRESSES	SC VI.1, 2, and 5	**R 336.1702(a)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
2. VOC content of the inks and coatings	25%, by volume, of the total volatile fraction, as applied, Or, the non-volatile fraction must be > 60% by volume of coating or ink, minus water and exempt solvents, as applied[2]	Instantaneous	Each press in FGWEBPRESSES	SC VI.1, 2, and 6	**R 336.1702(a)**

*No alcohol includes isopropyl alcohol (CAS #67-63-0), propyl alcohol (CAS #71-23-8), and ethanol (CAS #64-17-5)

3. All printing press-related cleaning solvents shall have VOC composite partial vapor pressures that do not exceed 10 mmHg @ 20°C (68°F).[2] **(R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All VOC containing inks, fountain solution, coatings, cleaning solvents such as blanket and roller washes, unused shop towels, etc. (materials) shall be store in closed containers and disposed of in an acceptable manner, in compliance with all applicable state rules and federal regulations.[2] **(R 336.1224, R 336.1225, R 336.1702(a))**

2. The permittee shall handle all VOC and/or HAP containing materials, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.[2] **(R 336.1224, R 336.1225, R 336.1702(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 verify the VOC content of any ink, coating, etc. (material), as received and as applied, using federal Reference Test Method 24 or 24A pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, VOC content may be determined from manufacturer's formulation data. If the Method 24 or 24A and the formulation values should differ, the method 24 or 24A results shall be used to determine compliance.[2] **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1225, R 336.1702(a))**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1225, R 336.1702)**

3. The permittee shall record the usage rate of each VOC containing material in VI.3, for each calendar month. **(R 336.1213(3))**

4. The permittee shall the following information on a calendar month basis for FGWEBPRESSES:
   a. The type of each VOC containing material used and reclaimed (ink, coating, fountain solution, blanket wash, press wash, roller wash, etc.).
   b. The VOC content of each material as received and as applied (in percent by weight or pounds per gallon).
   c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used or an alternate factor approved by the AQD District Supervisor.)
   d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. (Retention factors from Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006 may be used or an alternate factor approved by the AQD District Supervisor.)

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1702(a))**

5. The permittee shall calculate the VOC content of the fountain solution using the method detailed in Appendices 2.4 and 2.7 or an alternate method approved by the AQD District Supervisor. Calculations shall include both dampening aid and wetting agent, as used, in percent by weight. The permittee shall keep all records on file at the facility and make them available to the Department upon request.[2] **(R 336.1702(a))**

6. The permittee shall keep a written record, for each press, of VOC emission calculations determining the volume of VOCs in the inks and coatings, as a percentage of the total volatile fraction, including water; or the non-volatile volume faction of the inks and coatings as a percent of the ink or coating total volume, minus water, based upon an instantaneous basis. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. Calculations shall include both dampening aid and wetting agent, as used, in percent by weight. The permittee shall keep all records on file at the facility and make them available to the Department upon request.[2] **(R 336.1702(a))**

See Appendices 2.4 and 2.7

VII. REPORTING

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

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

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

See Appendix 2.8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWEBPRESSES (for EUWEBPRESS#1, #2, and #3)	20.4[2]	62.9[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
2. SVWEBPRESS#4	12[2]	65[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
3. SVWEBPRESS#5	12[2]	65[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
4. SVWEBPRESS#6-A	14[2]	29[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**
5. SVWEBPRESS#6-B	14[2]	29[2]	**R 336.1225, 40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

NA

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

FGRULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units: EUGLUER#1, EUGLUER#2, EUGLUER#3, EUGLUER#4, EUGLUER#5, EUGLUER#6, EUGLUER#7, EUGLUER#8, EUCARTON290ETHAC, EUSILICONE, and any other Rule 201 exempt emission unit pursuant to Rule 290.

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(a)(i))**

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

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

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

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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 DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor **(R 336.1213(3))**:
   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
   d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
   e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information **(R 336.1213(3))**:
   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
   b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate**. (R 336.1213(3))**

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

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 2.8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGCOLDCLEANERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUCOLDCLEANERS

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(h))**
   b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**

2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

   a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
   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(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 2.1. Abbreviations and Acronyms

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

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environment, Great Lakes, and Energy~~al Quality~~	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
GC	General Condition	psig	Pounds per square inch gauge
gr	Grains	PeTE	Permanent Total Enclosure
HAP	Hazardous Air Pollutant	PTI	Permit to Install
Hg	Mercury	RACT	Reasonable Available Control Technology
hr	Hour	ROP	Renewable Operating Permit
HP	Horsepower	SC	Special Condition
H_2S	Hydrogen Sulfide	scf	Standard cubic feet
HVLP	High Volume Low Pressure *	sec	Seconds
ID	Identification (Number)	SCR	Selective Catalytic Reduction
IRSL	Initial Risk Screening Level	SO_2	Sulfur Dioxide
ITSL	Initial Threshold Screening Level	SRN	State Registration Number
LAER	Lowest Achievable Emission Rate	TAC	Toxic Air Contaminant
lb	Pound	Temp	Temperature
m	Meter	THC	Total Hydrocarbons
MACT	Maximum Achievable Control Technology	tpy	Tons per year
MAERS	Michigan Air Emissions Reporting System	µg	Microgram
MAP	Malfunction Abatement Plan	VE	Visible Emissions
~~MDEQ~~EGLE	Michigan Department of Environment, Great Lakes, and Energy~~al Quality~~	VOC	Volatile Organic Compounds
mg	Milligram	yr	Year

mm	Millimeter

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

Appendix 2.2. Schedule of Compliance

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

Appendix 2.3. Monitoring Requirements

There are no specific monitoring requirements for this ROP. Therefore, this appendix is not applicable.

Appendix 2.4. Recordkeeping

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

Weight Percent of VOC* in Fountain Solution

Month/Year: _____

		A	B	C	D	E[1]
Date	**Material ID**	**Gallons used, as received**	**Density (#/gal)**	**VOC Content, as received (wt%)**	**Water Used (gallons)**	**VOC Content, as applied (wt%)**

*Includes both dampening aid and wetting agent.
[1]See Appendix 2.7 for calculation.

Appendix 2.5. Testing Procedures

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

Appendix 2.6. 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-B1678-2010. 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-B1678-2010b is being reissued as Source-Wide PTI No. MI-PTI-B1678-2015.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
MI-PTI-B1678-2010b	NA	Facility-wide PTI.	Source-wide
82-14	NA	Changed the material limits for the presses so that they are equivalent and can be combined into one flex group table.	FGWEBPRESSES

NA	201400040	Make corrections to the ROP by moving EUWEBPRESS#6 from Section 1 to Section 2; delete CAIR O_3 and NOx Budget Permits from Section 2.	EUWEBPRESS#6

Appendix 2.7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGWEBPRESSES. Alternative formats must be approved by the AQD district Supervisor.

To calculate the VOC weight percent for the table in appendix 2.4 above, use the following equation:

$$E = \frac{(A \times B \times C/100) \times 100}{(A \times B) + (D \times 8.34)}$$ (For C, if 9% use 9 not 0.09)

Appendix 2.8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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