

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

EFFECTIVE DATE: September 1, 2023

ISSUED TO

Morton Salt Incorporated

State Registration Number (SRN): B1824

LOCATED AT

180 6th Street, Manistee, Manistee County, Michigan 49660

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B1824-2023

Expiration Date: September 1, 2028

Administratively Complete ROP Renewal Application Due Between:
March 1, 2027 and March 1, 2028

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B1824-2023

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

Michigan Department of Environment, Great Lakes, and Energy

Shane Nixon, Cadillac / Gaylord District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

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

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

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

Permit Shield

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

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

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

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

Revisions

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

Reopenings

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

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

DESCRIPTION

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

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each Individual HAP	9.9 tpy ²	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.2	R 336.1225 R 336.1205(3)
2. Aggregate HAPs	24.9 tpy ²	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.2	R 336.1205(3)

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))

- All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(3))

2. The permittee shall keep the following information for SOURCE-WIDE:
 - a. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - b. Individual and aggregate HAP emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

If performance testing results exist for any of the aforementioned pollutants, those performance test results may be used to estimate pollutant emissions subject to the approval of the AQD. In the event that performance test results do not exist for a specific pollutant, emission factors approved by the AQD shall be used to estimate the emissions of a pollutant. All records shall be kept on file and made available to the Department upon request.² **(R 336.1205(3))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCOALCRUSHER	Coal crushing and conveying equipment with venturi scrubber particulate emissions control.	05-1945	NA
EU#6BOILER	Wickes spreader stoker coal and natural gas co-fired boiler and four module baghouse system capable of producing 180,000 pounds of steam per hour (216 MMBTU/hr heat input) which is used for generating process steam, electricity, and heat for facility production.	01-01-1948 05-11-1978 06-11-1980 10-04-1997 07-10-1998 11-07-2003 03-15-2006 07-10-2007 07-01-2014	FGMACTJJJJJJ
EUMILLTRANSFER	Salt transfer system consisting of mills, conveyors, bucket elevators, screens, feed tanks, salt bagging equipment, salt bulk loading equipment, and two wet scrubbers.	12-31-1923 04-12-2018	NA
EUPELLETCOOLING	Water softener pellet product cooling system with a venturi scrubber.	11-08-1985 08-30-1989	NA
EUTM/BLOCK	Salt product process and packaging machinery for the production of salt and trace mineral blocks with a baghouse.	05-17-1977	NA
EUBINTRANSFER	Material handling system consisting of conveyors, bucket elevators, and a wet impingement scrubber for transferring salt to other processes within the facility.	01-01-1922 08-11-1988	NA
EUPRETZELSALT	Totally enclosed pretzel salt production system which includes: a main crusher, a pellet press, a screw conveyor, a recycle crusher, a bucket elevator, and a sizing screener. Controlled by a 33,000 cfm baghouse known as the MAC dust collector.	05-29-2014	FGPELLPRETZEL
EUPELLPROD	Water softener pellet production which includes pellet briquetting machines, a Rotex 522A vibratory screen, belt conveyors, bucket elevators, and an enclosed crusher to recycle pellets. Controlled by a 33,000 cfm baghouse known as the MAC dust collector.	10-24-1989 04-15-1996	FGPELLPRETZEL

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCOLDCLEANER	Any cold cleaner that is grandfathered from Rule 201 pursuant to Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	NA	FGCOLDCLEANERS

**EUCOALCRUSHER
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Coal crushing and conveying equipment with venturi scrubber particulate emissions control.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Venturi Scrubber

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.10 lb/1000 lbs of exhaust gases ²	Hourly	EUCOALCRUSHER	SC VI.1 SC VI.2	R 336.1331(1)(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The compliant differential pressure range across the venturi scrubber shall be included in the AQD approved MAP. This compliant differential pressure range shall be determined by stack testing or other methods as approved by the District Supervisor. **(R 336.1213(3), R 336.1910, R 336.1911(2)(b))**
2. The compliant minimum liquid flow rate through the venturi scrubber shall be included in the AQD approved MAP. This compliant liquid flow rate shall be determined by stack testing or other methods as approved by the District Supervisor. **(R 336.1213(3), R 336.1910, R 336.1911)**
3. The permittee shall not operate EUCOALCRUSHER unless a MAP as described in Rule 911(2), for the air cleaning devices, has been submitted and is implemented and maintained. 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 60 days after such an event occurs. The permittee shall also amend the MAP within 60 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 336.1213(3), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a gauge which measures the pressure drop across the scrubber.² **(R 336.1910)**
2. The permittee shall install a liquid flow rate indicator on the scrubber. **(R 336.1213(2), R 336.1910)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the differential pressure across the scrubber once per day when EUCOALCRUSHER is operating. (R 336.1213(3))
2. The permittee shall monitor and record the scrubbing liquid flow rate through the scrubber once per day when EUCOALCRUSHER is operating. (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

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).

**EU#6BOILER
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Wickes spreader stoker coal and natural gas co-fired boiler capable of producing 180,000 pounds of steam per hour (216 MMBTU/hr heat input) which is used for generating process steam, electricity, and heat for facility production.

Flexible Group ID: FGMACTJJJJJ

POLLUTION CONTROL EQUIPMENT

Four Module Baghouse system and Dry Scrubber; Lime Injection System

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.30 lb / 1000 lbs of exhaust gases, corrected to 50% excess air ²	Hourly	EU#6BOILER	SC V.1	R 336.1331(1)(a)
2. SO ₂	2.5 lbs/MMBTU ²	Hourly	EU#6BOILER	SC II.2 SC V.4	R 336.1401(1)

II. MATERIAL LIMIT(S)

1. The design heat input rate for EU#6BOILER shall not exceed 216 MMBTU/hr.² (**R 336.1205**)
2. The sulfur content of coal combusted in EU#6BOILER shall not exceed 1.5% by weight.² (**R 336.1205**)
3. The chlorine content of coal combusted in EU#6BOILER shall not exceed 1.9 percent by weight.² (**R 336.1205**)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The design maximum heat input for firing natural gas, of the total heat input capacity for all fuels fired in EU#6BOILER, shall not exceed a maximum of 82 MMBTU/hr.² (**R 336.1205**)
2. The permittee shall not operate EU#6BOILER unless a MAP as described in Rule 911(2), for the air cleaning devices, has been submitted and is implemented and maintained. 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 60 days after such an event occurs. The permittee shall also amend the MAP within 60 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² (**R 336.1910, R 336.1911**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU#6BOILER unless the baghouse is installed, maintained, and operated in a satisfactory manner. Proper operation of the baghouse includes, but is not limited to, utilizing all four modules at all times except for during maintenance periods. During maintenance periods, the permittee may operate the baghouse utilizing only three modules for a maximum of 360 hours per 12-month rolling time period, as determined at the end of each calendar month.² (**R 336.1910**)

2. The permittee shall operate and maintain a differential pressure gauge to determine pressure across the baghouse. The compliant differential pressure range shall be included in the AQD approved MAP. The compliant differential pressure range shall be determined by stack testing.² **(R 336.1910)**
3. The permittee shall not operate EU#6BOILER unless the hydrated lime injection system is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes, but is not limited to:
 - a. Installation and operation of the hydrated lime injection system to comply with the emission limits for EU#6BOILER as demonstrated by performance testing;
 - b. Maintaining the hydrated lime injection rate at or above the level determined using the methodology in the MAP;
 - c. Operation and maintenance in accordance with the MAP.² **(R 336.1910)**
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, devices to monitor and record the coal usage rate and hydrated lime injection rate in EU#6BOILER on a continuous basis. As described in the MAP, records of the operating parameters of the boiler and boiler fuel feed equipment and lime injection system equipment may be temporarily substituted as acceptable data during periods of maintenance or repair of the required monitoring equipment.² **(R 336.1301, R 336.1331)**
5. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device (COMS) to monitor and record the visible emissions from EU#6BOILER on a continuous basis. The COMS shall be calibrated, maintained, and operated in accordance with Appendix 3 and the procedures set forth in 40 CFR 60.13, 40 CFR 63.11224(c)(1) through (7), and Performance Specification 1 (PS-1). The Performance Specification is located in Appendix B, 40 CFR, Part 60.² **(R 336.2150, 40 CFR 60.13, 40 CFR Part 60, Appendix B, R 336.1205, R 336.1301, R 336.1331)**

See Appendix 3

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 PM emission rates from EU#6BOILER when burning coal by testing at owner's expense, in accordance with Department requirements. The performance testing shall be conducted at least once every five years. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1205, R 336.2001, R 336.2003, R 336.2004)**

Testing shall be performed using an approved USEPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules

An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

2. The permittee shall verify HCl emission rates from EU#6BOILER by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
Hydrogen Chloride	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

3. The permittee shall verify the HCl emission rates from EU#6BOILER, at a minimum, every five years from the date of the last test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**
5. The permittee shall conduct an analysis of the coal, in a manner acceptable to the AQD, to determine the sulfur content, chlorine content and the higher heating value. The analysis shall be performed for each shipment of coal received. The AQD may require more frequent analyses.² **(R 336.1205, R 336.1401)**

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 continuously monitor and record the differential pressure across the baghouse.² **(R 336.1910, R 336.1331)**
2. The permittee shall monitor and record the visible emissions from EU#6BOILER on a continuous basis in a manner and with instrumentation acceptable to the AQD.² **(R 336.1301))**
3. The permittee shall keep records of start-up and shutdown periods of EU#6BOILER. The permittee shall keep records on file and make them available to the Department upon request.² **(R 336.1301, R 336.1331)**
4. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1401)**
5. The permittee shall keep the following records for each calendar day that EU#6BOILER is operated:
- a. Identification, type and the amounts (in tons of coal and cubic feet of natural gas) of all fuels combusted.
 - b. Sulfur content and higher heating value (BTU/lb) of all coals being combusted. For a single shipment of coal, the laboratory analysis of a representative sample shall be required once prior to any coal from that shipment being combusted in EU#6BOILER. Upon receipt of a new coal shipment, a new laboratory analysis is necessary.
 - c. Determination of compliance with the SO₂ emission limits specified in SC I.2. The permittee shall maintain daily records, in a format acceptable to the district supervisor, of SO₂ emissions calculated in pounds per MMBTU and using emission factors derived from the most recent coal analysis.
 - d. All applicable records required in the MAP for a., b., and c. above.

- e. The permittee shall keep the following records for each calendar day that EU#6BOILER is operated:
- 1) Chlorine content (percent by weight) of all coals being combusted. For a single shipment of coal, the laboratory analysis of a representative sample shall be required once prior to any coal from that shipment being combusted in EU#6BOILER. Upon receipt of a new coal shipment, a new laboratory analysis is necessary.
 - 2) HCl emissions calculations as described in the MAP.
 - 3) Minimum hydrated lime injection rate calculations as described in the MAP.
 - 4) Actual hydrated lime usage rate.
 - 5) All records required in the MAP.

The permittee shall keep all records on file at the facility and make them available to the Department upon request.²
(R 336.1205, R 336.1301, R 336.1401)

6. The permittee shall record the time and duration of each EU#6BOILER baghouse maintenance period (operation of only three out of four baghouse modules). The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1910)**
7. The permittee shall utilize COM-recorded opacity as an indicator of the proper operation of the dust collector. The indicator range of opacity defining proper function of the dust collector is 0-10%. Six-minute average values shall be based on 36 or more equally spaced instantaneous opacity measurements per six-minute period. The COM shall be calibrated in accordance with 40 CFR Part 60, Subpart A. **(40 CFR 64.6(c)(1)(i) and (ii))**
8. The permittee shall continuously record opacity. Six-minute average values shall be based on 36 equally spaced instantaneous opacity measurements per six-minute period. The COMS shall be calibrated in accordance with 40 CFR Part 60, Subpart A. **(40 CFR 64.6(c)(1)(iii))**
9. The permittee shall use the COMS to assure compliance with the PM limit. An excursion for PM shall be 2 consecutive 1-hour block average opacity values greater than 8.5%. This condition does not affect compliance with R 336.1301. **(40 CFR 64.6(c)(2))**
10. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64 compliance, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
11. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). In response to an excursion of more than 8.5% opacity based on 2 consecutive 1-hour block averages, the permittee shall refer to the corrective actions in Appendix 3. **(40 CFR 64.7(d))**
12. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

13. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) and any activities undertaken to implement a QIP, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

See Appendix 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 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))**
5. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
6. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. EU#6BOILER	78 ²	160 ²	R 336.1331

IX. OTHER REQUIREMENT(S)

1. The permittee shall complete an annual review of the MAP and amend the plan as necessary to assure compliance with the Michigan Air Pollution Control Rules. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval.² **(R 336.1910, R 336.1911)**
2. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

3. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

Footnotes:

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

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

**EUMILLTRANSFER
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Salt transfer system consisting of mills, conveyors, bucket elevators, screens, feed tanks, salt bagging equipment, salt bulk loading equipment.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Two wet scrubbers

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.10 lbs/1000 lbs of exhaust gases ²	NA	EUMILLTRANSFER	SC VI.1 SC VI.2	R 336.1331(1)(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain the liquid flow rate indicators to determine amount of liquids through the two wet scrubbers. The compliant minimum liquid flow rate through each wet scrubber shall be included in the AQD approved MAP. These compliant liquid flow rates shall be determined by stack testing or other methods as approved by the District Supervisor. **(R 336.1910, R 336.1911(2)(b))**
2. The permittee shall operate and maintain the differential pressure gauges to determine pressures across the two wet scrubbers. The compliant differential pressure range across each wet scrubber shall be included in the AQD approved MAP. These compliant differential pressure ranges shall be determined by stack testing or other methods as approved by the District Supervisor. **(R 336.1910, R 336.1911(2)(b))**
3. The permittee shall not operate EUMILLTRANSFER unless the wet scrubbers are installed and operating properly. **(R 336.1910)**
4. The permittee shall not operate EUMILLTRANSFER unless a MAP as described in Rule 911(2), for the air cleaning devices, has been submitted and is implemented and maintained. 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 60 days after such an event occurs. The permittee shall also amend the MAP within 60 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 336.1213(3), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a differential pressure gauge on each wet scrubber. (R 336.1910)
2. The permittee shall install a liquid flow rate indicator on each wet scrubber. (R 336.1910)

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the pressure drop across the two wet scrubbers on a daily basis when EUMILLTRANSFER is operating in a manner and with instrumentation acceptable to the AQD. (R 336.1213(3)(b))
2. The permittee shall monitor and record the scrubbing liquid flow rate through each wet scrubber on a daily basis when EUMILLTRANSFER is operating in a manner and with instrumentation acceptable to the AQD. (R 336.1213(3)(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)

NA

Footnotes:

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

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

**EUPELLETCOOLING
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Water softener pellet product cooling system.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Venturi Scrubber

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.032 lbs/1,000 lbs of exhaust gases, calculated on a dry gas basis ²	Hourly	EUPELLETCOOLING	SC V.1 SC VI.3 SC VI.4	R 336.1331(1)
2. PM	0.05 g/dscm (0.022 gr/dscf) ²	Hourly	EUPELLETCOOLING	SC V.1 SC VI.3 SC VI.4	40 CFR 60.672(a)
3. Visible Emissions (fugitive)	10% opacity ²	6-minute average	Openings in the building enclosing EUPELLETCOOLING	SC V.4 SC VI.12	40 CFR 60.672(b), R 336.1301(1)(b)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUPELLETCOOLING unless the wet scrubber is operating properly.² **(R 336.1910)**
2. The permittee shall operate and maintain a liquid flow rate indicator to determine amount of liquid through the wet scrubber. The compliant minimum liquid flow rate through the wet scrubber shall be included in the AQD approved MAP. This compliant liquid flow rate shall be determined by stack testing. **(R 336.1213(2), R 336.1910, R 336.1911)**
3. The permittee shall operate and maintain the differential pressure gauge to determine pressure drop across the wet scrubber. The compliant differential pressure range across the wet scrubber shall be included in the AQD approved MAP. This compliant differential pressure range shall be determined by stack testing. **(R 336.1213(2), R 336.1910, R 336.1911)**
4. The permittee shall not operate EUPELLETCOOLING unless a MAP as described in Rule 911(2), for the air cleaning devices, has been submitted and is implemented and maintained. 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 60 days after such an event occurs. The permittee shall also amend the MAP within 60 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 336.1213(3), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain, and operate a device to continuously measure the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within ± 250 pascals (± 1 -inch water gauge pressure) and must be calibrated on an annual basis in accordance with the manufacturer's instructions. **(40 CFR 60.674(a)(1))**
2. The permittee shall install, calibrate, maintain, and operate a device to continuously measure the scrubbing liquid flow rate through the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within $\pm 5\%$ of the design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with the manufacturer's instructions. **(40 CFR 60.674(a)(2))**

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 PM emission rates from EUPELLETCOOLING by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.676(f))**
2. The permittee shall verify the PM emission rates from EUPELLETCOOLING, at a minimum, every five years from the date of the last test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain documentation of the accuracy of the differential pressure gauge from the manufacturer. **(R 336.1213(3))**
2. The permittee shall maintain documentation of the accuracy of the scrubbing liquid flow rate indicator from the manufacturer. **(R 336.1213(3))**
3. The permittee shall record the differential pressure across the wet scrubber on a daily basis when EUPELLETCOOLING is operating in a manner and with instrumentation acceptable to the AQD. **(40 CFR 60.676(c))**
4. The permittee shall record the scrubbing liquid flow rate through the wet scrubber on a daily basis when EUPELLETCOOLING is operating in a manner and with instrumentation acceptable to the AQD. **(40 CFR 60.676(c))**
5. The permittee shall continuously measure pressure drop and record daily as an indicator of proper operation of the scrubber. The indicator range is less than 6.5 inches of water, gauge. **(40 CFR 64.6(c)(1)(i) and (ii))**

6. The pressure gauge shall continuously monitor differential pressure across the wet scrubber. The monitor shall be calibrated annually. **(40 CFR 64.6(c)(1)(iii))**
7. An excursion is a departure from the indicator range of greater than any instant reading greater than 6.5 inches of water pressure drop. **(40 CFR 64.6(c)(2))**
8. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance. (other than those caused by excused startup or shutdown conditions). An excursion is a departure from the indicator range of greater than any instant reading greater than 6.5 inches of water pressure drop. An excursion will cause immediate investigation and repair. **(40 CFR 64.7(d))**
9. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
10. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
11. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**
12. The permittee shall conduct and document 30-minute visible emissions observations using EPA Method 22, on a quarterly basis from the building housing EUPELLETCOOLING when EUPELLETCOOLING is operating. If during the observation there are any visible emissions detected, the problem contributing to visible emissions shall be corrected within 24 hours, and the permittee shall re-perform the non-certified visible emissions observation, and document whether there are no longer visible emissions observed when EUPELLETCOOLING is operating. **(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 submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

5. On a semiannual basis, the permittee shall report all occurrences when the measurements of the scrubber pressure loss and liquid flow rate differ by more than $\pm 30\%$ from the average determined during the most recent performance test. These reports shall be postmarked within 30 days following the end of the second and fourth quarters. **(40 CFR 60.676(d) and (e))**
6. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
7. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVPELLETCOOLING	21 ²	90 ²	R 336.1331

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants. **(40 CFR Part 60, Subpart OOO)**
2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**
3. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

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).

**EUTM/BLOCK
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Salt product process and packaging machinery for the production of salt and trace mineral blocks.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.10 lb / 1000 lbs of exhaust gases, calculated on a dry gas basis ²	Hourly	EUTM/BLOCK	SC V.1 SC VI.1	R 336.1331(1)(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The compliant differential pressure range across the baghouse shall be included in the AQD approved MAP. This compliant differential pressure range shall be determined by stack testing or other methods as approved by the District Supervisor. **(R 336.1213(2), R 336.1910, R 336.1911)**
2. The permittee shall not operate EUTM/BLOCK unless the baghouse is installed and operating properly. Proper operation is maintaining the baghouse with the differential pressure range referenced in the MAP. **(R 336.1213(2), R 336.1910)**
3. The permittee shall not operate EUTM/BLOCK unless a MAP as described in Rule 911(2), for the air cleaning devices, has been submitted and is implemented and maintained. 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 60 days after such an event occurs. The permittee shall also amend the MAP within 60 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 336.1213(3), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a differential pressure gauge on the baghouse. **(R 336.1213(2), R 336.1910)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the differential pressure across the baghouse on a daily basis when EUTM/BLOCK is operating. **(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

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).

**EUBINTRANSFER
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Material handling system consisting of conveyors, and bucket elevators for transferring salt to other processes within the facility.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Wet Impingement Scrubber

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.027 lbs/1,000 lbs of exhaust gases, calculated on a dry gas basis ²	NA	EUBINTRANSFER	SC V.1 SC VI.1 SC VI.2	R 336.1331(1)(b)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUBINTRANSFER unless the wet impingement scrubber is installed and operating properly.² **(R 336.1910)**
2. Proper operation of the wet impingement scrubber includes operating with the differential pressure across the scrubber and the liquid flow through the scrubber within ranges prescribed in the AQD approved MAP. **(R 336.1910, R 336.1911)**
3. The permittee shall operate and maintain the differential pressure gauge to determine pressure drop across the wet scrubber. The compliant differential pressure range across the wet impingement scrubber shall be included in the AQD approved MAP. The compliant differential pressure range shall be determined by stack testing or other methods as approved by the District Supervisor. **(R 336.1910, R 336.1911)**
4. The permittee shall operate and maintain a liquid flow rate indicator to determine amount of liquid through the wet scrubber. The compliant minimum liquid flow rate through the wet impingement scrubber shall be included in the AQD approved MAP. The compliant liquid flow rate shall be determined by stack testing or other methods as approved by the District Supervisor. **(R 336.1910, R 336.1911)**
5. Input to the material handling system shall cease immediately, consistent with safe operating procedures, upon failure of the wet impingement scrubber. Input to the material handling system shall not restart until the scrubber is back on line and functioning properly.² **(R 336.1910)**

6. The permittee shall not operate EUBINTRANSFER unless a MAP as described in Rule 911(2), for the air cleaning devices, has been submitted and is implemented and maintained. 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 60 days after such an event occurs. The permittee shall also amend the MAP within 60 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 336.1213(3), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a liquid flow rate indicator on the wet impingement scrubber. **(R 336.1910)**
2. The permittee shall install a differential pressure gauge on the wet impingement scrubber. **(R 336.1910)**

V. TESTING/SAMPLING

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

1. Upon the request of the AQD District Supervisor, the permittee shall verify PM emission rates from EUBINTRANSFER by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1205, R 336.2001, R 336.2003, R 336.2004)**

Testing shall be performed using an approved USEPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules

An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the differential pressure across the wet impingement scrubber on a daily basis when EUBINTRANSFER is operating. **(R 336.1213(3)(b))**
2. The permittee shall monitor and record the liquid flow rate through the wet impingement scrubber on a daily basis when EUBINTRANSFER is operating. **(R 336.1213(3)(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)

NA

Footnotes:

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

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

D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACTJJJJJJ	Requirements for any existing large (≥ 10 MMBTU/hr) coal-fired industrial, commercial, or institutional boiler that is located at an area source of hazardous air pollutants per 40 CFR Part 63, Subpart JJJJJJ	EU#6BOILER
FGPELLPRETZEL	Water softener pellet production line and a pretzel salt production line, which are both controlled by a common baghouse.	EUELLPROD EUPRETZELSALT
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCOLDCLEANER

**FGMACTJJJJJ
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Requirements for any existing large (≥10 MMBTU/hr) coal-fired industrial, commercial, or institutional boiler that is located at an area source of hazardous air pollutants per 40 CFR Part 63, Subpart JJJJJJ.

Emission Unit: EU#6BOILER

POLLUTION CONTROL EQUIPMENT

Four Module Baghouse system and Dry Scrubber; Lime Injection System

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Mercury	2.2 x 10 ⁻⁰⁵ lb/MMBTU heat input *	Hourly	Each boiler	SC V.2 SC V.7 SC VI.1	40 CFR 63.11201, 40 CFR Part 63, Subpart JJJJJJ, Table 1.6.a
2. CO	420 ppm by volume on a dry basis corrected to 3% oxygen *	Hourly	Each boiler	SC V.2 SC VI.1	40 CFR 63.11201, 40 CFR Part 63, Subpart JJJJJJ, Table 1.6.b
3. VE	10%	Maintain opacity to less than or equal to 10% opacity (daily block average);	EU#6BOILER	SC IV.2	40 CFR 63.11201(c) and Table 3 of Subpart JJJJJJ

* The emission limits apply at all times except during startup and shutdown.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The emission limits, operating standards, work practice standards, emission reduction measures, and management practices apply at all times each boiler in FGMACTJJJJJJ is operating, except during periods of startup and shutdown as defined in 40 CFR 63.11237, during which time the permittee must comply with SC III.2. **(40 CFR 63.11201)**
- The permittee must minimize the startup and shutdown periods of each boiler in FGMACTJJJJJJ following the manufacturer's recommended procedures, if available. If manufacturer's recommended procedures are not available, the permittee must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available. **(40 CFR 63.11214(d), 40 CFR 63.11223(g), 40 CFR Part 63, Subpart JJJJJJ, Table 2.1)**

3. At all times the permittee must operate and maintain each boiler in FGMACTJJJJJJ, 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 the permittee 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 that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.11205(a))**
4. The permittee shall maintain the 30-day rolling average operating load of each boiler in FGMACTJJJJJJ such that it does not exceed 110% of the highest hourly average operating load recorded during the most recent performance test. **(40 CFR 63.11212(c), 40 CFR 63.11224(d), 40 CFR Part 63, Subpart JJJJJJ, Table 3.7)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee must install, operate, and maintain an oxygen analyzer system in accordance with the manufacturer's recommendations. Oxygen analyzer systems must be installed to monitor oxygen in the boiler flue gas, boiler firebox, or other appropriate intermediate location. The permittee shall maintain the 30-day rolling average oxygen content at or above the minimum oxygen concentration measured during the most recent CO performance test. **(40 CFR 63.11224(c) and (d), 40 CFR Part 63, Subpart JJJJJJ, Table 6.3)**
2. The permittee must install, operate, certify and maintain in a satisfactory manner a COMS to monitor and record opacity on a continuous basis. The monitor shall be operated in accordance with the procedures in 40 CFR Part 60, Appendix B and the site-specific monitoring plan developed according to 40 CFR 63.11224(c) as specified in SC VI.1. The permittee shall maintain an opacity of less than or equal to 10% opacity (daily block average). **(40 CFR 63.11224(e), 40 CFR Part 63, Subpart JJJJJJ, Table 3.1.a)**

V. TESTING/SAMPLING

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

1. The permittee must demonstrate compliance with all applicable emission limits using performance stack testing, fuel analysis, or a continuous monitoring system (CMS), including a continuous emission monitoring system (CEMS), a continuous opacity monitoring system (COMS), or a continuous parameter monitoring system (CPMS), where applicable. **(40 CFR 63.11205(b))**
2. The permittee must conduct all performance tests according to 40 CFR 63.7(c), (d), (f), and (h), and each stack test according to the requirements in Table 4 of 40 CFR Part 63, Subpart JJJJJJ. The permittee must also develop a site-specific test plan according to the requirements in 40 CFR 63.7(c). Performance stack tests must be conducted at the representative operating load conditions while burning the type of fuel or mixture of fuels that have the highest emissions potential for each regulated pollutant, and establish the operating limits based on these performance stack tests. Following each performance stack test and until the next performance stack test, the permittee must comply with the operating limit for operating load conditions established from the results of the performance stack test. **(40 CFR 63.11212)**
3. The permittee shall verify the Mercury and CO emission rates from EUBOILER#6 at a minimum, on a triennial basis. Triennial performance tests must be completed no more than 37 months after the previous performance test. **(40 CFR 63.11220(a))**
4. The permittee must submit a Notification of Intent to conduct a performance test to the administrator at least 60 days before the performance stack test is scheduled to begin. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor. **(R 336.1213(3), 40 CFR 63.11225(a)(3))**

5. For existing affected boilers that have not operated since the previous compliance demonstration and more than 3 years have passed since the previous compliance demonstration, the permittee must complete the permittee's subsequent compliance demonstration no later than 180 days after the re-start of the affected boiler. **(40 CFR 63.11220(e))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. If the permittee demonstrates compliance with any applicable emission limit through performance stack testing and subsequent compliance with operating limits (including the use of CPMS), with a CEMS, or with a COMS, the permittee must develop a site-specific monitoring plan according to the requirements in 40 CFR 63.11205(c)(1) through (3), as listed below:
 - a. For each CMS required (including CEMS, COMS, or CPMS), the permittee must develop, and submit to the Administrator for approval upon request, a site-specific monitoring plan, as listed below. This requirement to develop and submit a site-specific monitoring plan does not apply to affected sources with existing CEMS or COMS operated according to the performance specifications under 40 CFR Part 60, Appendix B and that meet the requirements of 40 CFR 63.11224. **(40 CFR 63.11205(c)(1))**
 - i. Installation of the CMS sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device). **(40 CFR 63.11205(c)(1)(i), 40 CFR 63.11224(c)(1)(i))**
 - ii. Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems. **(40 CFR 63.11205(c)(1)(ii), 40 CFR 63.11224(c)(1)(ii))**
 - iii. Performance evaluation procedures and acceptance criteria (e.g., calibrations). **(40 CFR 63.11205(c)(1)(iii), 40 CFR 63.11224(c)(1)(iii))**
 - iv. Ongoing operation and maintenance procedures. **(40 CFR 63.11205(c)(1)(iv), 40 CFR 63.11224(c)(2)(i))**
 - v. Ongoing data quality assurance procedures. **(40 CFR 63.11205(c)(1)(v), 40 CFR 63.11224(c)(2)(ii))**
 - vi. Ongoing recordkeeping and reporting procedures. **(40 CFR 63.11205(c)(1)(vi), 40 CFR 63.11224(c)(2)(iii))**
 - b. The permittee must conduct a performance evaluation of each CMS in accordance with the permittee's site-specific monitoring plan. **(40 CFR 63.11205(c)(2), 40 CFR 63.11224(c)(3))**
 - c. The permittee must operate and maintain the CMS in continuous operation according to the site-specific monitoring plan. **(40 CFR 63.11205(c)(3), 40 CFR 63.11224(c)(4))**
2. The permittee must operate the monitoring system and collect data at all required intervals at all times each boiler in FGMACTJJJJJ is operating and compliance is required, except for periods of monitoring system malfunctions or out-of-control periods (see 40 CFR 63.8(c)(7)), repairs associated with monitoring system malfunctions or out-of-control periods, and required monitoring system quality assurance or quality control activities including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in the permittee's site-specific monitoring plan. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The permittee is required to complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable. **(40 CFR 63.11221(b))**

3. The permittee may not use data collected during monitoring system malfunctions or out-of-control periods, repairs associated with monitoring system malfunctions or out-of-control periods or required monitoring system quality assurance or quality control activities in calculations used to report emissions or operating levels. Any such periods must be reported according to the requirements in SC VII.5. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system. **(40 CFR 63.11221(c))**
4. Except for periods of monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in the permittee's site-specific monitoring plan), failure to collect required data is a deviation of the monitoring requirements. **(40 CFR 63.11221(d))**
5. The permittee must demonstrate continuous compliance with each emission limit and operating limit, as listed below:
 - a. The permittee must continuously monitor the operating parameters according to the methods specified in Table 7 of 40 CFR Part 63, Subpart JJJJJJ, as applicable. Operation above the established maximum, below the established minimum, or outside the allowable range of the operating limits, as applicable, constitutes a deviation from the permittee's operating limits established under Table 3 of 40 CFR Part 63, Subpart JJJJJJ, except during performance tests conducted to determine compliance with the emission and operating limits or to establish new operating limits. Operating limits are confirmed or reestablished during performance tests. **(40 CFR 63.11222(a)(1))**
 - b. The permittee must keep records of the type and amount of all fuels burned in each boiler in FGMACTJJJJJJ during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would result in lower emissions of mercury than the applicable emission limit (if permittee demonstrates compliance through fuel analysis), or result in lower fuel input of mercury than the maximum values calculated during the last performance stack test (if permittee demonstrates compliance through performance stack testing). **(40 CFR 63.11222(a)(2))**
6. The permittee must maintain the records listed below.
 - a. The permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted. **(40 CFR 63.11225(c)(1))**
 - b. The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices as listed below. **(40 CFR 63.11225(c)(2))**
 - i. Records must identify each boiler in FGMACTJJJJJJ, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. **(40 CFR 63.11225(c)(2)(i))**
 - ii. For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1), the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria under 40 CFR 241.3(d)(1). If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2 and each of the legitimacy criteria in 40 CFR 241.3(d)(1). If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c), the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary material as fuel per 40 CFR 241.4, the permittee must keep records documenting that the material is a listed non-waste under 40 CFR 241.4(a). **(40 CFR 63.11225(c)(2)(ii))**
 - iii. The permittee must maintain a copy of the energy assessment report for each boiler in FGMACTJJJJJJ. **(40 CFR 63.11225(c)(2)(iii))**
 - iv. The permittee must also keep records of monthly fuel use by each boiler in FGMACTJJJJJJ, including the type(s) of fuel and amount(s) used. **(40 CFR 63.11225(c)(2)(iv))**

- d. Records of the occurrence and duration of each malfunction of each boiler in FGMACTJJJJJ, or of the associated air pollution control and monitoring equipment. **(40 CFR 63.11225(c)(4))**
- e. Records of actions taken during periods of malfunction to minimize emissions including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.11225(c)(5))**
- f. The permittee must keep the records of all inspection and monitoring data of each boiler in FGMACTJJJJJ required by SC VI.2 through 5, and the information, for each required inspection or monitoring, as listed below.
 - i. The date, place, and time of the monitoring event. **(40 CFR 63.11225(c)(6)(i))**
 - ii. Person conducting the monitoring. **(40 CFR 63.11225(c)(6)(ii))**
 - iii. Technique or method used. **(40 CFR 63.11225(c)(6)(iii))**
 - iv. Operating conditions during the activity. **(40 CFR 63.11225(c)(6)(iv))**
 - v. Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation. **(40 CFR 63.11225(c)(6)(v))**
 - vi. Maintenance or corrective action taken (if applicable). **(40 CFR 63.11225(c)(6)(vi))**
7. The permittee's records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years. **(40 CFR 63.11225(d))**

See Appendix 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 must report each instance in which the permittee did not meet each emission limit and operating limit in Tables 1 and 3 of 40 CFR Part 63, Subpart JJJJJJ that apply to the permittee. These instances are deviations from the emission limits in 40 CFR Part 63, Subpart JJJJJJ. **(40 CFR 63.11222(b))**
5. The permittee must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information as listed below. The permittee must submit the report by March 15 if the permittee had any deviations.
 - a. Company name and address. **(40 CFR 63.11225(b)(1))**
 - b. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR Part 63, Subpart JJJJJJ. The permittee's notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

- i. For units that do not qualify for a statutory exemption as provided in Section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.” **(40 CFR 63.11225(b)(2)(ii))**
 - ii. “This facility complies with the requirements in 40 CFR 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.” **(40 CFR 63.11225(b)(2)(iii))**
 - c. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. **(40 CFR 63.11225(b)(3))**
 - d. The total fuel use by each boiler in FGMACTJJJJJ, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by the permittee or EPA through a petition process to be a non-waste under 40 CFR 241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 241.3, and the total fuel usage amount with units of measure. **(40 CFR 63.11225(b)(4))**
 - e. The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the USEPA at the appropriate address listed in 40 CFR 63.13. **(40 CFR 63.11225(a)(4)(vi))**
6. Within 60 days after the date of completing each required performance test, the permittee must submit the results of the performance tests, including any associated fuel analyses. For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) at the time of the test, the permittee must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the test, the permittee must submit the results of the performance test to the Administrator at the appropriate address listed in 40 CFR 63.13. **(40 CFR 63.11225(e)(1))**
7. The permittee shall submit any performance test reports including RATA reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

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).

**FGPELLPRETZEL
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Water softener pellet production line and a pretzel salt production line, which are both controlled by a common baghouse.

Emission Units: EUPELLPROD, EUPRETZELSALT

POLLUTION CONTROL EQUIPMENT

33,000 cfm baghouse known as the MAC dust collector.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.014 gr/dscf ²	Hourly	FGPELLPRETZEL	SC V.1 SC V.2 SC VI.1 SC VI.2	40 CFR 60.672(a) R 336.1331(1)(b)
2. PM 10	3.56 pph ²	Hourly	FGPELLPRETZEL	SC V.1 SC V.2 SC VI.1 SC VI.2	40 CFR 52.21(c)&(d), R 336.1205(1)(a)&(3)
3. PM 2.5	2.53 pph ²	Hourly	FGPELLPRETZEL	SC V.1 SC V.2 SC VI.1 SC VI.2	40 CFR 52.21(c)&(d)
4. Visible Emissions (fugitive)	7% opacity ²	6-minute average	Openings in the building enclosing FGPELLPRETZEL	SC V.3 SC VI.2	40 CFR 60.672(b)&(e) R 336.1301(1)(b)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGPELLPRETZEL unless the baghouse is installed and operating properly. Satisfactory operation includes maintaining operating parameters within the ranges specified in the MAP.² **(R 336.1910)**
2. Salt that is collected in and recovered from the baghouse shall be handled in a manner that minimizes the introduction of air contaminants to the outer air.² **(R 336.1370)**
3. The permittee shall operate and maintain the baghouse with a differential pressure gauge.² **(R 336.1301, R 336.1910)**
4. The compliant differential pressure range across the baghouse shall be included in the AQD approved MAP. This compliant differential pressure range shall be determined by performance testing.² **(R 336.1910, R 336.1911(2)(b))**

5. The permittee shall not operate FGPELLPRETZEL unless a MAP as described in Rule 911(2), for the air cleaning devices, has been submitted and is implemented and maintained. 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 60 days after such an event occurs. The permittee shall also amend the MAP within 60 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 336.1213(3), R 336.1910, 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))**

1. No later than June 2023, the permittee shall verify PM, PM10, and PM2.5 emission rates from FGPELLPRETZEL, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10 / PM2.5	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 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.2001, R 336.2003, R 336.2004, R 336.2802, 40 CFR 60.672, 40 CFR 60.675(b)(1))**

2. The permittee shall verify PM, PM10, and PM2.5 emission rates from FGPELLPRETZEL, by testing at owner's expense, in accordance with Department requirements once every five years, unless an alternate testing schedule is approved by the AQD District Supervisor. Testing shall be performed using an approved EPA Method listed:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10 / PM2.5	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 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.2001, R 336.2003, R 336.2004, R 336.2802, 40 CFR 60.672, 40 CFR 60.675(b)(1))**

3. The permittee shall determine compliance with visible emissions from the building housing FGPELLPRETZEL, completed according to 40 CFR 60.675, using Method 9 observations every 5 years during performance testing. The duration of the observations is 30 minutes total for evaluation of visible emissions of each side of the building and roof. Compliance with the applicable fugitive emission limits must be based on the average of the five 6-minute averages.² **(R 336.1301, 40 CFR 60.11, 40 CFR 60.675 (c)(3), 40 CFR 60.675(d), and 40 CFR Part 60, Subpart OOO, Tables 1 and 3)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the pressure drop across the baghouse on a daily basis when FGPELLPRETZEL is operating in a manner and with instrumentation acceptable to the AQD.² **(R 336.1910, R 336.1911(2)(b))**
2. The permittee shall conduct and document 30-minute visible emissions observations using EPA Method 22, on a quarterly basis from the stack when FGPELLPRETZEL is operating. If during the observation there are any visible emissions detected, the problem contributing to visible emissions shall be corrected within 24 hours, and the permittee shall re-perform the non-certified visible emissions observation, and document whether there are no longer visible emissions observed when FGPELLPRETZEL is operating.² **(40 CFR 60.674(c))**
3. The permittee shall record each visible emission observation from the stack, including the date and any corrective actions taken, in a written or electronic logbook. The permittee shall keep these records on file at the facility and make them available to the AQD upon request.² **(40 CFR 60.676(b)(1))**

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 two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.² **(R 336.12001(3))**
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.² **(R 336.2001(4))**
6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.² **(R 336.2001(5), 40 CFR 60.676(f))**

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. SV-PELLPRETZ	32 X 32 ²	51 ²	R 336.1331

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the Standards of Performance for Nonmetallic Mineral Processing Plants, as specified in 40 CFR Part 60, Subpart A and Subpart OOO.² (**40 CFR Part 60, Subparts A and OOO**)

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).

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUCOLDCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EU#6BOILER.

Continuous Opacity Monitoring System (COMS) Requirements

1. The COMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 1 of Appendix B, 40 CFR Part 60.
2. The permittee shall perform quality assurance procedures contained in 40 CFR 60, Appendix F, Procedure 3, or a procedure acceptable to AQD. Within 30 days after the completion of any audits, the results shall be submitted to the AQD.
3. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to Air Quality Division, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:
 - a. A report of each exceedance above 15% opacity. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period.
 - b. A report of all periods of COMS downtime and corrective action.
 - c. A report of the total operating time of the EU#6BOILER during the reporting period.
 - d. If no exceedances or COMS downtime occurred during the reporting period, the permittee shall report that fact.

All monitoring data shall be kept on file for a period of at least five (5) years and made available to the AQD upon request.

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B1824-2015. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B1824-2015a is being reissued as Source-Wide PTI No. MI-PTI-B1824-2023.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201800015	Remove FGRULE287(c) and EUFILTER-TRANSFER (part of FGHANDLING) from ROP, the spray booth is no longer used, and the wet impingement scrubber has been replaced with enclosed screw conveyors, so the scrubber is no longer utilized.	FGRULE287(c), FGHANDLING
54-14A	NA	Remove the existing vibratory screen and install a new vibratory screen in EUPELLPROD.	FGPELLPRETZEL

Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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