

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

EFFECTIVE DATE: December 9, 2013

ISSUED TO

Coding Products, Incorporated

State Registration Number (SRN): B6175

LOCATED AT

111 West Park Drive, Kalkaska, Kalkaska County, Michigan 49646

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B6175-2013

Expiration Date: December 9, 2018

Administratively Complete ROP Renewal Application Due Between
June 9, 2017 and June 9, 2018

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B6175-2013

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

Michigan Department of Environmental Quality

Janis Denman, Cadillac District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

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 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). **(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. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; “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 Rule 301(1)(a) or (b) unless otherwise specified in this ROP.” The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.
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). **(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(4))**

Monitoring/Recordkeeping

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

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.
22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

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

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

27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

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

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
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:
- 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))**
 - If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - 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))**
 - 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(7))**

Stratospheric Ozone Protection

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

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

Risk Management Plan

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

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. ² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. ² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ. ² **(R 336.1219)**

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCOATER1	Coating Line 1 applies a continuous layer of coating material across a portion of the web substrate using the hot stamp (HS) process with the Mayer Rod Coating Technology. Regenerative Thermal Oxidizer (RTO) in combination with the Capture System/ Permanent Total Enclosure.	1/1/1978	FGCOATING12456, FGCOATING-ALL
EUCOATER2	Coating Line 2 applies a continuous layer of coating material across a portion of the web substrate using the HS process with the Mayer Rod Coating Technology. RTO in combination with the Capture System/ Permanent Total Enclosure.	6/1/1981	FGCOATING12456, FGCOATING-ALL
EUCOATER3	Coating Line 3 applies a continuous layer of coating material across a portion of the web substrate using the HS process with the Mayer Rod Coating Technology. Solvent recovery system.	1/1/1985	FGCOATING-ALL
EUCOATER4	Coating Line 4 applies a continuous layer of coating material across a portion of the web substrate using the Thermal Transfer (TTR) process with the Gravure Technology. RTO in combination with the Capture System/ Permanent Total Enclosure.	6/23/1998	FGCOATING12456, FGCOATING-ALL
EUCOATER5	Coating Line 5 applies a continuous layer of coating material across a portion of the web substrate using the TTR process with the Gravure Technology. RTO in combination with the Capture System/ Permanent Total Enclosure.	11/1/1999	FGCOATING12456, FGCOATING-ALL

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCOATER6	Coating Line 6 applies a continuous layer of coating material across a portion of the web substrate using the TTR process with the Gravure Technology. RTO in combination with the Capture System/ Permanent Total Enclosure.	7/6/2001	FGCOATING12456, FGCOATING-ALL

**EUCOATER3
 EMISSION UNIT CONDITIONS**

DESCRIPTION The emission unit, EUCOATER3, applies a continuous layer of coating material across a portion of the web substrate using the Hot Stamp process with the Mayer Rod Coating Technology

Flexible Group ID: FGCOATING-ALL

POLLUTION CONTROL EQUIPMENT Solvent Recovery System

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAPs	No more than 5% applied (95% reduction)	For each month.	EUCOATER3	V.1, VI.3, IX.1	40 CFR 63.3320 (b)(1))

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUCOATER3 unless the solvent recovery system is installed and operating properly.² (R 336.1702(a), R 336.1910)
2. At no time shall any purge operations take place on EUCOATER3 unless the Solvent Recovery System is installed and operating properly.² (R 336.1702(a), R 336.1910)
3. The permittee shall determine volatile matter recovered and conduct monthly liquid-liquid material balance. (40 CFR 63.3350(a)(2), 40 CFR 63.3360(b)(2))
4. The permittee shall calibrate, maintain, and operate according to the manufacturer's specification a micro motion meter that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The micro motion meter must be certified by the manufacturer to be accurate to within plus or minus (+/-) 2 percent by mass. (40 CFR 63.3350(d)(2))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee must determine the organic HAP mass fraction of each coating material as-purchased by following one of the following procedures. **(40 CFR 63.3360(c)(1), (2) and (3))**
 - a. *Method 311*: The permittee may test the coating material in accordance with Method 311 of appendix A 40 CFR, Part 63. The Method 311 determination may be performed by the manufacturer of the coating material and the results provided to the permittee. The organic HAP content must be calculated according to the following criteria and procedures.
 - (i) Include each organic HAP determined to be present at greater than or equal to 0.1 mass percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 mass percent for other organic HAP compounds.
 - (ii) Express the mass fraction of each organic HAP you include according to paragraph (c)(1)(i) of this section as a value truncated to four places after the decimal point (for example, 0.3791).
 - (iii) Calculate the total mass fraction of organic HAP in the tested material by summing the counted individual organic HAP mass fractions and truncating the result to three places after the decimal point (for example, 0.763).
 - b. *Method 2*: For coatings, determine the volatile organic content as mass fraction of nonaqueous volatile matter and use it as a substitute for organic HAP using Method 24 of 40 CFR, Part 60, Appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee.
 - c. *Formulation data*: The permittee may use formulation data to determine the organic HAP mass fraction of a coating material. Formulation data may be provided to the permittee by the manufacturer of the material. In the event of an inconsistency between Method 311 (appendix A of 40 CFR, Part 63) test data and a permittee's formulation data, and the Method 311 test value is higher, the Method 311 data will govern. Formulation data may be used provided that the information represents all organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used.

VI. MONITORING/RECORDKEEPING

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

1. The permittee must maintain the following records on a monthly basis. **(40 CFR 63.3410(a)(1)(iii) and (vi))**
 - a. Records of all measurements needed to demonstrate compliance including:
 - (i) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(c);
 - (ii) Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations.
2. The permittee must maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.3370. The records must be maintained in accordance with the requirements of § 63.10(b). **(40 CFR 63.3410(b))**
3. The permittee must perform a monthly liquid-liquid material balance as specified in the paragraphs below and use the method in Appendix 7A, or an equivalent method approved by the District Supervisor, AQD, to convert the data. **(40 CFR 63.3370 (i))**
 - a. Determine the mass of each coating material applied on the web coating line during the month.
 - b. Determine the organic HAP content of each coating material as-applied during the month following the procedure in V TESTING/SAMPLING.
 - c. Determine and monitor the amount of volatile organic matter recovered for the month according to the procedures in III PROCESS/OPERATIONAL RESTRICTION(S).

4. The permittee must determine the monthly organic HAP emissions. The permittee must determine the amount of coating material applied at greater than or equal to 20 mass percent coating solids and the amount of coating material applied at less than 20 mass percent coating solids. The allowable organic HAP limit is then calculated based on coating material applied at greater than or equal to 20 mass percent coating solids complying with 0.2 kg organic HAP per kg coating solids and coating material applied at less than 20 mass percent coating solids complying with 4 mass percent organic HAP follows: **(40 CFR 63.3370(l))**
 - a. Determine the as-purchased mass of each coating material applied each month.
 - b. Determine the as-purchased coating solids content of each coating material applied each month in accordance with § 63.3360(d)(1).
 - c. Determine the as-purchased mass fraction of each coating material which was applied at 20 mass percent or greater coating solids content on an as-applied basis.
 - d. Determine the total mass of each solvent, diluent, thinner, or reducer added to coating materials which were applied at less than 20 mass percent coating solids content on an as-applied basis each month
 - e. Calculate the monthly allowable organic HAP emissions using Equation 13a found in 40 CFR 64.3370(l)(5).
5. The permittee shall utilize the P2 blower and liquid level on HE-4 (Heat Exchanger) on the Solvent Recovery System as indicators of the proper functioning of the Solvent Recovery System. The liquid level range on Heat Exchanger is 26-51 percent. **(40 CFR 64.6(c)(1)(i) and (ii), 40 CFR 64.6(c)2)**
6. The permittee shall monitor the P2 blower and liquid level on HE-4 (Heat Exchanger) on the-Solvent Recovery System. An excursion for VOC shall be the P2 and liquid level on Heat Exchanger outside of the range of 26-51 percent. **(40 CFR 64.6(c)(1)(iii))**
7. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that EUCOATER3 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 permittee 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. The permittee shall utilize the P2 blower and liquid level on HE-4 (Heat Exchanger) as an indicator of the proper functioning of the Solvent Recovery System when EUCOATER3 is operating. Data recorded during monitoring malfunctions, repair activities and QA/QC operations shall not be used for 40 CFR, Part 64 compliance. **(40 CFR 64.6(c)(3), 64.7(c))**
8. Upon detecting an excursion or exceedance, the permittee shall restore operation of EUCOATER3 (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). **(40 CFR 64.7(d))**
9. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
10. The permittee shall operate the monitoring device during all periods that the emission unit is operating. Data recorded during 9-8-11 4 ROP Manual 4 F 6 monitoring malfunctions, repair activities, and QA/QC operations shall not be used to determine 40 CFR, Part 64 compliance. **(40 CFR 64.6(c)(3), 64.7(c))**

See Appendix 7A

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
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))**
2. 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))**
3. 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. **(40 CFR, Part 60.7, R 336.2001, R 336.12001(3))**
4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the AQD District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**
5. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5))**
6. The permittee shall notify the AQD of a deviation for any averaging period for which the permittee does not have valid monitoring data and such data are required. **(40 CFR 63.3350(e)(8))**
7. The permittee must submit a semiannual compliance report in accordance to 40 CFR 63.3400(c). This semiannual report shall contain information outlined in 40 CFR 63.3400(2). This semiannual report may be submitted to the AQD with the semiannual report referenced in VII.2. **(40 CFR 63.3400(c))**
8. 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))**
9. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall demonstrate the overall organic HAP control efficiency is equal to 95 percent on a monthly basis when using multiple capture systems and control device. When using a solvent recovery device, the permittee shall show compliance by following the procedures in 40 CFR 63.3370(i). The permittee shall use Appendix 7F or an equivalent method approved by the District Supervisor, AQD. **(40 CFR 63.3370(a)(4) and (5), 40 CFR 63.3370(i), 40 CFR 63.3370(k), 40 CFR 63.3370(p))**
2. The permittee shall maintain a startup, shutdown, and malfunction abatement plan approved by the AQD. **(R 336.1911, 40 CFR 63.3340, 40 CFR, Part 63, Subpart JJJJ, Table 2)**
3. The permittee shall be in compliance with all applicable requirements of 40 CFR, Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating. **(40 CFR, Part 63, Subpart JJJJ)**
4. The permittee shall promptly notify AQD for the need to modify the CAM Plan if the existing plan is found to be inadequate and shall submit a proposed modification to the ROP if necessary. **(40 CFR 64.7(e))**
5. The permittee shall comply with all applicable requirements of 40 CFR, Part 64. **(40 CFR, Part 64)**

See Appendix 7F

Footnotes:

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

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

D. FLEXIBLE GROUP 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
FGCOATING12456	<p>The Emission Units apply a continuous layer of coating material across a portion of the web substrate.</p> <p>EUCOATER1 and EUCOATER2 utilize the Hot Stamp process with the Mayer Rod Coating Technology. EUCOATER4, EUCOATER5, and EUCOATER6 utilize the Thermal Transfer process with the Gravure Technology.</p> <p>These emissions units are controlled by the RTO in combination with the Capture System/Permanent Total Enclosure.</p>	<p>EUCOATER1, EUCOATER2, EUCOATER4, EUCOATER5, EUCOATER6</p>
FGCOATING-ALL	<p>The Emission Units apply a continuous layer of coating material across a portion of the web substrate.</p> <p>EUCOATER1, EUCOATER2, and EUCOATER3 utilize the Hot Stamp process with the Mayer Rod Coating Technology. EUCOATER4, EUCOATER5, and EUCOATER6 utilize the Thermal Transfer process with the Gravure Technology.</p> <p>EUCOATER1, EUCOATER2, EUCOATER4, EUCOATER5, EUCOATER6 are controlled by the RTO in combination with the Capture System/Permanent Total Enclosure. EUCOATER3 is controlled by the Solvent Recovery System (SRS).</p>	<p>EUCOATER1, EUCOATER2, EUCOATER3, EUCOATER4, EUCOATER5, EUCOATER6</p>

FGCOATING12456
FLEXIBLE GROUP CONDITIONS

DESCRIPTION The Emission Units apply a continuous layer of coating material across a portion of the web substrate. EUCOATER1 and EUCOATER2 utilize the Hot Stamp process with the Mayer Rod Coating Technology. EUCOATER4, EUCOATER5, and EUCOATER6 utilize the Thermal Transfer process. with the Gravure Technology.

Emission Units: EUCOATER1, EUCOATER2, EUCOATER4, EUCOATER5, EUCOATER6

POLLUTION CONTROL EQUIPMENT RTO in combination with the Capture System/Permanent Total Enclosure.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAPs	No more than 5 percent of the HAP applied (95 percent reduction)	For each month	FG COATING12456	V.2, V.3, VI.8	40 CFR 63.3320(b)(1))

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not use release coat big mix coating X-43 on any of the coating lines in FGCOATING12456.² (R 336.1702(a))
2. The permittee shall not operate any of the coating lines in FGCOATING12456 unless the Capture System/Permanent Total Enclosure described in Appendix 9 is installed and operating properly.² (R 336.1702(a), R 336.1225)
3. The permittee shall not operate any of the coating lines in FGCOATING12456 unless the RTO is installed and operating properly.² (R 336.1702(a), R 336.1910)
4. At no time shall any clean-up operations take place on a line unless the RTO is installed and operating properly.² (R 336.1702(a), R 336.1910)
5. The VOC destruction efficiency of the RTO shall be at least 98 percent.² (R 336.1702(a), R 336.1225)
6. The operation temperature of the RTO shall be 1400 degrees Fahrenheit or higher.² (R 336.1702(a), R 336.1225)

7. The permittee shall operate a continuous parameter monitoring system on the Capture System/Permanent Total Enclosure. **(40 CFR 63.3350(a)(4))**
8. The permittee shall demonstrate compliance with the emission limits if the Capture System/Permanent Total Enclosure is operated at minus three and a half inches (-3.5") Water Column on the RTO fan as established in accordance with testing, or as established in future testing. **(40 CFR 63.3370(k)(3))**
9. The permittee shall operate the Capture System/Permanent Total Enclosure in accordance to the monitoring plan approved by the AQD. **(40 CFR 63.3321(a), 40 CFR 63.3350(f), 40 CFR, Part 63, Subpart JJJJ, Table 1(3))**
10. The permittee shall operate a continuous parameter monitoring system on the RTO. **(40 CFR 63.3350(a)(3))**
11. The permittee shall demonstrate compliance with the emission limits if the RTO is operated such that the average temperature is greater than the temperature established during testing for each 3-hour period. **(40 CFR 63.3370(k)(3))**
12. The permittee shall operate the RTO as follows: **(40 CFR 63.3321(a), 40 CFR, Part 63, Subpart JJJJ, Table 1(1))**
 - a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established during the most recent performance testing. The combustion temperatures are identified in the RTO Startup Shutdown Malfunction Abatement Plan approved by the AQD.
 - (i) The permittee must collect the RTO combustion temperature data according to VI MONITORING/RECORDKEEPING.
 - (ii) The collected RTO combustion temperature data shall be reduced to 3-hour block averages.
 - (iii) The RTO combustion temperature shall be maintained with the 3-hour average combustion temperature at or above the temperature limit.

See Appendix 9

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The RTO shall be equipped with a working continuous combustion temperature monitor.² **(R 336.1702(a), R 336.1213(a))**
2. The RTO shall be designed so the retention time of air contaminants in the RTO is 0.5 seconds or more.² **R 336.1702(a)**

V. TESTING/SAMPLING

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

1. All testing, sampling, analytical and calibration procedures shall be performed in accordance with 40 CFR, Part 60, and USEPA Reference Methods 18 and 24, or other acceptable methods approved by the AQD. **(R 336.1213(3)(a)(i))**
2. The permittee shall conduct performance tests on the RTO every five years to determine the destruction efficiency of the RTO. The testing shall be conducted per the requirements of 40 CFR 63.3360(e), or as approved by the AQD. **(R 336.1213(3), 40 CFR 63.3360(a)(2), 40 CFR 63.3360(e))**
3. The permittee shall conduct performance tests on the Capture System/Permanent Total Enclosure every five years to determine the capture efficiency of the Capture System/Permanent Total Enclosure. The testing shall be conducted per the requirements of 40 CFR 63.3360(f)(1), or as approved by the AQD. **(40 CFR 63.3360(a)(2), R 336.1213(3))**

4. The permittee may assume the capture efficiency equals 100 percent if the permittee's capture system is a permanent total enclosure (PTE). The permittee must confirm that the capture system is a permanent total enclosure by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR, Part 51 Appendix M, and that all exhaust gases from the enclosure are delivered to the RTO. **(40 CFR 63.3360(f)(1))**
5. The permittee must record process information to determine the conditions in existence at the time of the RTO performance test. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test. **(40 CFR 63.3360(e)(2))**
6. The permittee must establish the RTO operating limits during the performance test according to the following: **(40 CFR 63.3360(e), 40 CFR 63.3360(e)(3)(i))**
 - a. During the performance test, the permittee must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee must monitor the temperature in the firebox of the RTO or immediately downstream of the firebox before any substantial heat exchange occurs.
 - b. Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the RTO.

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 temperature in the RTO on a continuous basis in a manner and with instrumentation acceptable to the AQD.² **(R 336.1702(a), R 336.1213(3)(a))**
2. The permittee shall develop a site-specific monitoring plan for the Capture System/Permanent Total Enclosure containing the following information. The permittee must make the monitoring plan available for inspection by the AQD upon request. **(40 CFR 63.3350(f)(1),(2),(3),(4), and (5))**
 - a. The monitoring plan must:
 - (i) Identify the minus three and a half inches (-3.5") Water Column on the RTO fan as the operating parameter to be monitored to ensure that the capture efficiency determined during the compliance test is maintained. The permittee may use an alternate operating parameter if it is approved by the AQD; and
 - (ii) Explain why this parameter is appropriate for demonstrating ongoing compliance; and
 - (iii) Identify the specific monitoring procedures.
 - b. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.
 - c. The permittee must conduct all capture system monitoring in accordance with the site-specific monitoring plan.
 - d. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.
 - e. The permittee must review and update the capture system monitoring plan at least annually.
3. The permittee must monitor the Capture System/Permanent Total Enclosure and conduct all capture system monitoring in accordance with the monitoring plan. **(40 CFR 63.3350(f)(1) and (2))**
4. Any deviation from the operating parameter value or range of values which are monitored according to the Capture System/Permanent Total Enclosure monitoring plan will be considered a deviation from the operating limit. **(40 CFR 63.3350(f)(4))**

5. The permittee must review and update the Capture System/Permanent Total Enclosure monitoring plan at least annually. **(40 CFR 63.3350(f)(5))**
6. The permittee shall comply with the following for the RTO. **(40 CFR 63.3350(e)(9)(i) and (ii))**
 - a. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the data logger and temperature indicator must be verified every 3 months or the data logger and temperature indicator must be replaced. The permittee must replace the equipment whether the permittee chooses not to perform the calibration or the equipment cannot be calibrated properly.
 - b. Install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.
7. The permittee shall continuously monitor the operating parameters of the Capture System/Permanent Total Enclosure, and RTO, whenever a web coating line is operated. The parameters are established during testing. The testing is described in V. TESTING/SAMPLING. **(40 CFR 63.3370(k)(1)(iii) and (3))**
8. The permittee must demonstrate that the overall organic HAP control efficiency is equal to 95 percent. The permittee shall use Appendix 7F or an equivalent method approved by the District Supervisor, AQD. **(40 CFR 63.3370(a)(5), R 336.1213(3))**
9. The permittee shall operate the Capture System/Permanent Total Enclosure, and the RTO, and have always-controlled work stations to demonstrate that the overall organic HAP control efficiency is equal to 95 percent. **(40 CFR 63.3370(p)(3))**
10. The permittee must maintain the following records on a monthly basis. **(40 CFR 63.3410(a)(1)(ii) and (v), 40 CFR 63.3410(a)(2))**
 - a. Records of all measurements needed to demonstrate compliance including:
 - (i) Capture System/Permanent Total Enclosure, and RTO, operating parameter data.
 - (ii) Overall control efficiency determination using Capture System/Permanent Total Enclosure capture efficiency, and RTO destruction or removal efficiency test results.
 - b. Records specified in § 63.10(c) for each continuous parameter monitoring system.
11. The permittee must install, operate, and maintain each continuous parameter monitoring system on the Capture System/Permanent Total Enclosure, and RTO, as follows: **(40 CFR 63.3350(e)(1-8))**
 - a. Each continuous parameter monitoring system must complete a minimum of one cycle of operation for each successive 15-minute period. The permittee must have a minimum of four equally spaced successive cycles of continuous parameter monitoring system operation to have a valid hour of data.
 - b. The permittee must have valid data from at least 90 percent of the hours during which the process operated.
 - c. The permittee must determine the hourly average of all recorded readings according to the following:
 - (i) To calculate a valid hourly value, the permittee must have at least three of four equally spaced data values from that hour from a continuous monitoring system that is not out-of-control.
 - (ii) Provided all of the readings recorded clearly demonstrate continuous compliance with the standards, then the permittee is not required to determine the hourly average of all recorded readings.

- d. The permittee must determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, the permittee must have at least two of three of the hourly averages for that period using only average values that are based on valid data (*i.e.*, not from out-of-control periods).
 - e. The permittee must record the results of each inspection, calibration, and validation check of the continuous parameter monitoring system.
 - f. At all times, the permittee must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), the permittee must conduct all monitoring at all times that the Capture System/Permanent Total Enclosure and/or RTO is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions. The permittee must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
 - h. Any averaging period for which there is not valid monitoring data and data are required constitutes a deviation, and the permittee shall notify the AQD in accordance with VII. Reporting.
12. The permittee shall utilize temperature as an indicator of the proper functioning of the RTO. The appropriate range of temperature defining proper function of the RTO is above 1400 degrees Fahrenheit. **(40 CFR 64.6(c)(1)(i and ii))**
13. The permittee shall continuously record the RTO temperature. **(40 CFR 64.6(c)(1)(iii))**
14. The permittee shall use the temperature to assure compliance with the VOC limit. An excursion for VOC shall be the RTO temperature less than 1400 degrees Fahrenheit. **(40 CFR 64.6(c)(2))**
15. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that FGCOATING12456 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 permittee 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. The permittee shall utilize temperature as an indicator of the proper functioning of the RTO when FGCOATING12456 is operating. Data recorded during monitoring malfunctions, repair activities and QA/QC operations shall not be used for 40 CFR, Part 64 compliance. **(40 CFR 64.6(c)(3), 64.7(c))**
16. The permittee shall utilize static pressure as an indicator of the proper functioning of the permanent total enclosure. The proper function of the permanent total enclosure is -3.5 (or below) inches of water column. **(40 CFR 64.6(c)(1)(i and ii))**
17. The permittee shall use a vacuum sensor (transducer) that increases or decreases with fan speed to maintain the pressure of the permanent total enclosure. **(40 CFR 64.6(c)(1)(iii))**
18. The permittee shall use the static pressure of the permanent total enclosure to assure compliance with the VOC limit. An excursion for VOC shall be defined as a reading of static pressure above -3.5 inches water column. **(40 CFR 64.6(c)(2))**

19. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that FGCOATING12456 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 permittee 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. The permittee shall utilize pressure as an indicator of the proper functioning of the permanent total enclosure when FGCOATING12456 is operating. Data recorded during monitoring malfunctions, repair activities and AQ/QC operations shall not be used for 40 CFR, Part 64 compliance. **(40 CFR 64.6(c)(3), 64.7(c))**
20. Upon detecting an excursion or exceedance, the permittee shall restore operation of FGCOATING12456 (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). **(40 CFR 64.7(d))**
21. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
22. The permittee shall operate the monitoring device during all periods that the emission unit is operating. Data recorded during 9-8-11 4 ROP Manual 4 F 6 monitoring malfunctions, repair activities, and QA/QC operations shall not be used to determine 40 CFR, Part 64 compliance. **(40 CFR 64.6(c)(3), 64.7(c))**

Appendix 7F

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 submit to the AQD a semiannual compliance report in accordance with 40 CFR 63.3400(c). **(40 CFR 63.3400(c))**
5. The permittee shall submit to the AQD a semiannual startup, shutdown and malfunction report in accordance to 40 CFR 63.3400. **(40 CFR 63.3400(g))**
6. The permittee shall notify the AQD of a deviation for any averaging period for which the permittee does not have valid monitoring data and such data are required. **(40 CFR 63.3350(e)(8))**
7. The permittee shall submit a Notification of Performance Test and two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. **(R 336.12001(3), 40 CFR 60.7, 40 CFR 63.3400(d), (e), (f))**

8. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**
9. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5), 40 CFR 60.7, 40 CFR 63.3400(d), (e), (f))**
10. 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))**
11. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVOXIDIZER	68 ¹	45 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain a monitoring plan for the Capture System/Permanent Total Enclosure approved by the AQD. **(40 CFR 63.3321(a), 40 CFR 63.3350(f), 40 CFR, Part 63, Subpart JJJJ, Table 1(3))**
2. The permittee shall maintain a Startup, Shutdown, and Malfunction Abatement Plan for the RTO approved by the AQD. The Startup, Shutdown, and Malfunction Abatement Plan shall include the RTO combustion temperatures established during the most recent performance testing. **(R 336.1911, 40 CFR 63.3340, 40 CFR, Part 63, Subpart JJJJ, Table 1(1))**
3. The permittee shall be in compliance with all applicable requirements of 40 CFR, Part 63, Subpart JJJJ, of the National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating. **(40 CFR, Part 63, Subpart JJJJ)**
4. The permittee shall promptly notify AQD for the need to modify the CAM Plan if the existing plan is found to be inadequate and shall submit a proposed modification to the ROP if necessary. **(40 CFR 64.7(e))**

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

See Appendix 7F

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).

**FGCOATING - ALL
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION The Emission Units apply a continuous layer of coating material across a portion of the web substrate. EU COATER1, EU COATER2, and EU COATER3 utilize the Hot Stamp process with the Mayer Rod Coating Technology. EU COATER4, EU COATER5, and EU COATER6 utilize the Thermal Transfer process with the Mayer Rod Coating Technology.

Emission Unit: EU COATER1, EU COATER2, EU COATER3, EU COATER4, EU COATER5, EU COATER6.

POLLUTION CONTROL EQUIPMENT RTO in combination with the Capture System/Permanent Total Enclosure on EU COATER1, EU COATER2, EU COATER4, EU COATER5, and EU COATER6. Solvent Recovery System (SRS) on EU COATER3.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	47.8 pounds per hour ²		FGCOATING-ALL including cleanup and purge operations from all emission units combined	V.1, VI.8	R 336.1702(a), R 336.1225,
2. VOC	171.9 tons per year ²	Based on a 12 month rolling time period as determined at the end of each calendar month.	FGCOATING-ALL including cleanup and purge operations from all emission units combined	VI.1	R 336.1702(a), R 336.1225
3. VOC	4.79 pounds per gallon of solids applied. ^{2a}	Based upon a 24-hour averaging period.	EU COATER1, EU COATER2, EU COATER3, EU COATER4, EU COATER5, EU COATER6 (The limit applies to each individual Emission Unit)	V.2, V.3, VI.3, VI.4, VI.5, VI.6	R 336.1702(a), R 336.1225

a This is equivalent to using a coating comprised of not more than 2.9 pounds of VOC per gallon of coating (minus water) as applied, with a VOC density of 7.36 pounds per gallon, and with a mass transfer efficiency of 100 percent. Release coat big mix coating (X-43), in EU COATER 3, is exempt from this requirement. The permittee may comply with this requirement through emission averaging. Emission averaging allows for compliance with the pounds VOC per gallon of solids applied requirements to be demonstrated by averaging emissions over all six coating lines if the following provisions are met:

- The average VOC emissions from FGCOATING-ALL are less than 4.31 pounds VOC per gallon solids applied, determined on a calendar day basis; and

- The average VOC emissions from FGCOATING-ALL are calculated using the method given in Appendix 7B or an equivalent method approved by the District Supervisor, AQD.

See Appendix 7B

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall dispose of waste coatings and/or solvents in a manner, which minimizes the introduction of air contaminants to the outer air.² (R 336.1370)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The combined total VOC pounds per hour emission rate from FGCOATING-ALL shall be tested every five years. All testing, sampling, analytical and calibration procedures shall be performed in accordance with 40 CFR, Part 60, and USEPA Reference Method 18 or other acceptable methods approved by the AQD. (R 336.1213(3)(a))
2. The permittee shall test the VOC content of any non-waterborne coating, as applied, using Method 24 or other EPA approved reference method. Random testing of coatings will be conducted on a yearly basis with all coatings tested within a five-year period. (R 336.1213(3))
3. The permittee shall test actual VOC emission rates in pounds VOC per gallon of solids applied for each coating used in **EUCOATER 3** (not to include release coat big mix coating X-43). Random testing of coatings will be conducted on a yearly basis with all coatings tested within a five-year period. All testing, sampling, analytical and calibration procedures shall be performed in accordance with 40 CFR, Part 60, and USEPA Reference Methods 18 and 24, or other acceptable methods approved by the AQD. (R 336.1213(3)(a)(i))

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall calculate the actual combined total VOC emission rate from all of the coating lines in FGCOATING-ALL and all clean-up and purge operations for each 12-month rolling time period, as determined at the end of each calendar month. This calculation shall be done using the method detailed in Appendix 7E or an equivalent method approved by the District Supervisor, AQD. This information shall be made available to the AQD upon request.² (R 336.1702(a), R 336.1213(3)(a))
2. The permittee shall calculate the actual combined total VOC emission rate from the six coating lines in FGCOATING-ALL and all clean-up and purge operations for each calendar week, using the method detailed in Appendix 7C or an equivalent method approved by the District Supervisor, AQD. This information shall be made available to the AQD upon request.² (R 336.1702(a), R 336.1213(3)(a))
3. The permittee shall calculate the actual VOC emission rates in pounds of VOC per gallon of solids applied from each coating line in FGCOATING-ALL, and also calculate the combined total average VOC emission rate in pounds of VOC per gallon of solids applied from FGCOATING-ALL, for each calendar day, using the method

detailed in Appendix 7B or an equivalent method approved by the District Supervisor, AQD. The release coat big mix coating (X-43) is not to be included in this calculation. This information shall be made available to the AQD upon request.² **(R 336.1702(a), R 336.1213(3)(a), R 336.2206)**

4. The permittee shall calculate the actual VOC emission rates in pounds of VOC per gallon of solids applied from EUCOATER3 for each calendar day, using the method detailed in Appendix 7A or an equivalent method approved by the District Supervisor, AQD. The release coat big mix coating X-43 is not to be included in this calculation. This information shall be kept on file and made available to the AQD upon request.² **(R 336.1702(a), R 336.1213(3)(a))**
5. The permittee shall calculate the actual VOC emission rates in pounds of VOC per gallon of solids applied from each EUCOATER1, EUCOATER2, EUCOATER4, EUCOATER5, and EUCOATER6 using the method detailed in Appendix 7A or an equivalent method approved by the District Supervisor, AQD.² **(R 336.1702(a), R 336.1213(3)(a))**
6. The permittee shall calculate the combined total average emission rate in pounds of VOC per gallon of solids applied from FGCOATING12456 for each calendar day, using the method detailed in Appendix 7B or an equivalent method approved by the District Supervisor, AQD.² **(R 336.1702(a), R 336.1213(3)(a))**
7. The permittee shall maintain separate daily records of coatings and solvent usage rates and VOC contents of each solvent and coating used on each coating line in FGCOATING-ALL, including materials used in clean-up and purge operations. These records shall be made available to the AQD upon request.² **(R 336.1702(a), R 336.1213(3)(a))**
8. The permittee shall use the calculation in Appendix 7D to show compliance with VOC pound per hour limit. **(R 336.1213(3))**

See Appendixes 7A, 7B, 7C, 7D, and 7E

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. **(40 CFR, Part 60.7, R 336.2001, R 336.1201)**
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. **(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. **(R 336.2001(5))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVOXIDIZER	68 ¹	45 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall label each web coating line.² **(R 336.1201(3))**
2. The permittee shall not conduct any clean up and/or purge operations on a line unless RTO or SRS are installed and operating properly.² **(R 336.1702(a), R 336.1910)**

Footnotes:

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

FG-COLD CLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: Cold Cleaners

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

- a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
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. **(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. **(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.
(R 336.2001(5))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Abbreviations and Acronyms

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

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

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

There are no specific testing requirement plans or procedures for this ROP. 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-B6175-2008. 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-B6175-2008 is being reissued as Source-Wide PTI No. MI-PTI-B6175-2013

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA	NA

Appendix 7A. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUCOATER3 and FGCOATING-ALL.

DAILY VOC EMISSION RATES IN POUNDS OF VOC PER GALLON OF SOLIDS APPLIED,
 EUCOATER _____ DAY _____

	A	B	C	D	$E=1 - [(C \times D) / 10,000]$	$F = A \times B \times E$
COATING ID	GALLONS COATING USED AS APPLIED	LBS VOC PER GALLON OF COATING	VOC CAPTURE EFFICIENCY (PERCENT)	VOC CONTROL EFFICIENCY (PERCENT)	CONTROL FACTOR	EMISSIONS OF VOC
VOC EMISSIONS IN POUNDS PER DAY FOR THIS LINE, G = SUM OF F ----->						

	A	H	J	$K = [A \times H \times J / 100]$	N	$O=[N \times F]$
COATING ID	GALLONS COATING USED AS APPLIED	SOLIDS FRACTION OF COATING (% SOLIDS from coating formula)	ACTUAL SOLIDS TRANSFER EFFICIENCY (PERCENT)	GALLONS SOLIDS APPLIED TO SURFACE	HAP FRACTION OF COATING (% HAP from coating formula)	HAP Emissions
TOTAL GAL APPLIED SOLIDS, L = SUM OF K ----->						

TOTAL POUNDS VOC PER GALLON APPLIED SOLIDS, **M** = G / L ----->

Appendix 7B. Emission Calculations

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

AVERAGE POUNDS VOC PER GALLON APPLIED SOLIDS FROM EUCOATER 1-6 FOR EACH CALENDAR DAY

DATE	Actual POUNDS VOC PER GALLON APPLIED SOLIDS (see Appendix 7A at M) EUCOATER1	Actual POUNDS VOC PER GALLON APPLIED SOLIDS (see Appendix 7A at M) EUCOATER2	Actual POUNDS VOC PER GALLON APPLIED SOLIDS (see Appendix 7A at M) EUCOATER3	Actual POUNDS VOC PER GALLON APPLIED SOLIDS (see Appendix 7A at M) EUCOATER4	Actual POUNDS VOC PER GALLON APPLIED SOLIDS (see Appendix 7A at M) EUCOATER5	Actual POUNDS VOC PER GALLON APPLIED SOLIDS (see Appendix 7A at M) EUCOATER6	TOTAL POUNDS VOC PER GALLON APPLIED SOLIDS = (SUM OF EUCOATER 1-6)	AVERAGE POUNDS VOC PER GALLON APPLIED SOLIDS = (SUM OF EUCOATER 1-6)/6
								AVERAGE POUNDS VOC PER GALLON APPLIED SOLIDS = (SUM OF EUCOATER 1,2,4,5,6)/5

Appendix 7C. Emission Calculations

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

TOTAL ACTUAL COMBINED VOC EMISSIONS FROM EUCOATER 1-6 FOR CALENDAR WEEK _____ THROUGH _____

EUCOATER	POUNDS VOC (see Appendix 7A at G) SUNDAY	POUNDS VOC (see Appendix 7A at G) MONDAY	POUNDS VOC (see Appendix 7A at G) TUESDAY	POUNDS VOC (see Appendix 7A at G) WEDNESDAY	POUNDS VOC (see Appendix 7A at G) THURSDAY	POUNDS VOC (see Appendix 7A at G) FRIDAY	POUNDS VOC (see Appendix 7A at G) SATURDAY
EUCOATER 1							
EUCOATER 2							
EUCOATER 3							
EUCOATER 4							
EUCOATER 5							
EUCOATER 6							
TOTAL POUNDS VOC/DAY= SUM OF EUCOATER 1-6							

Appendix 7D. Emission Calculations

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

VOC EMISSIONS in POUNDS PER HOUR FROM FGCOATINGALL Including Cleanup and Purge Operations							
EUCOATER	POUNDS VOC PER HOUR (see Appendix 7A at G/HOURS OPERATED) SUNDAY	POUNDS VOC PER HOUR (see Appendix 7A at G /HOURS OPERATED) MONDAY	POUNDS VOC PER HOUR (see Appendix 7A at G /HOURS OPERATED) TUESDAY	POUNDS VOC PER HOUR (see Appendix 7A at G /HOURS OPERATED) WEDNESDAY	POUNDS VOC PER HOUR (see Appendix 7A at G /HOURS OPERATED) THURSDAY	POUNDS VOC PER HOUR (see Appendix 7A at G /HOURS OPERATED) FRIDAY	POUNDS VOC PER HOUR (see Appendix 7A at G /HOURS OPERATED) SATURDAY
EUCOATER 1							
EUCOATER 2							
EUCOATER 3							
EUCOATER 4							
EUCOATER 5							
EUCOATER 6							
TOTAL POUNDS VOC PER HOUR from FGCOATINGALL = SUM OF EUCOATER 1-6							

Appendix 7E. Emission Calculations

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

Total VOC for FGCOATING-All for calendar month and 12-month rolling time period

Month/year: _____

Day	Daily total VOC (pounds)
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
29	
30	
31	
TOTAL POUNDS /MONTH = sum of all above	
TOTAL TONS/MONTH = total pounds/2000	

Month	Total Tons
This month	
1 month ago	
2 months ago	
3 months ago	
4 months ago	
5 months ago	
6 months ago	
7 months ago	
8 months ago	
9 months ago	
10 months ago	
11 months ago	
TOTAL TONS PER MOST RECENT 12 MONTH ROLLING PERIOD = sum of all above	

Appendix 7F. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUCOATING3 and FGCOATER12456.

HAP REDUCTION FROM EUCOATERS 1-6 AND SOURCE WIDE FOR MONTH								
EUCOATER	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5	TOTAL HAP EMISSIONS (PER EMISSION UNIT)	TOTAL HAP AS APPLIED (PER EMISSION UNIT)	HAP REDUCTION (PER EMISSION UNIT)
EUCOATER 1	Note A	(Sum of weeks 1 through 5)	Note B	(Total HAP emissions divided by the Total HAP as applied)*100				
EUCOATER 2								
EUCOATER 3								
EUCOATER 4								
EUCOATER 5								
EUCOATER 6								
						SOURCE WIDE HAP EMISSIONS	(P=Sum of all Emission Units TOTAL HAP EMISSIONS)	
						SOURCE WIDE HAP APPLIED THIS MONTH	(Q=Sum of all Emission Units HAP as applied)	
						SOURCE WIDE HAP REDUCTION % (P/Q)*100		

Note A: Information is summed from Appendix 7A (Column O)
 Note B: Information is summed from Appendix 7A (Column A x B x N)

Appendix 8. Reporting

Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ 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.

Appendix 9. Capture System/Permanent Total Enclosure

CRITERIA FOR ACHIEVING "TOTAL ENCLOSURE" AROUND A WEB COATING LINE

1. Access doors and windows in the total enclosure must be closed during routine operation of the process.
2. The interior of the total enclosure must operate at a lower pressure than its surroundings so that air flows into the enclosure at all natural draft openings (NDO) at all times. A NDO are defined as an opening that is not connected to a duct in which a fan or a blower is installed.
3. The average velocity through all NDO must be at least 3,600 meters/hour (200 feet/minute). This velocity will be calculated by dividing the difference between the rate of any forced make-up air and exhaust rate (cubic meters per hour) by the total cross-sectional area of all NDO (square meters). If the calculated average velocity is between 3600 and 9000 meters/hour (200-500 feet/minute) however, it will be necessary to verify that the flow through the NDO is continuously into the enclosure. Techniques for making this determination include observation of streamers attached to the perimeter of the NDO, smoke released from smoke tubes just inside NDO, or tracer gas analysis. An average velocity greater than 9000 meters/hour (500 feet/minute) will be considered adequate to ensure that the direction of air flow through the NDO is continuously inward unless there is obvious evidence to the contrary.
4. Any source of VOC emissions inside the total enclosure must be at least four equivalent diameters (4 times the opening area divided by the perimeter) from each NDO.
5. The total area of all NDO shall be less than 5 percent of the surface area of the total enclosure's four walls, floor, and ceiling.