

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

EFFECTIVE DATE: February 22, 2023

ISSUED TO

E-T-M Enterprises, Inc.

State Registration Number (SRN): B6202

LOCATED AT

920 North Clinton Street, Grand Ledge, Eaton County, Michigan

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B6202-2023

Expiration Date: February 22, 2028

Administratively Complete ROP Renewal Application
Due Between August 22, 2026 and August 22, 2027

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B6202-2023

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

Michigan Department of Environment, Great Lakes, and Energy

Brad Myott, Field Operations Manager

TABLE OF CONTENTS

AUTHORITY AND ENFORCEABILITY 3

A. GENERAL CONDITIONS..... 4

Permit Enforceability 4

General Provisions..... 4

Equipment & Design 5

Emission Limits 5

Testing/Sampling 5

Monitoring/Recordkeeping 6

Certification & Reporting 6

Permit Shield 7

Revisions 8

Reopenings..... 8

Renewals 9

Stratospheric Ozone Protection 9

Risk Management Plan 9

Emission Trading 9

Permit to Install (PTI) 10

B. SOURCE-WIDE CONDITIONS 11

C. EMISSION UNIT SPECIAL CONDITIONS 14

EMISSION UNIT SUMMARY TABLE..... 14

EUFLINERBOOTH 15

D. FLEXIBLE GROUP SPECIAL CONDITIONS..... 19

FLEXIBLE GROUP SUMMARY TABLE..... 19

FGPRESSANDMIXING..... 21

FGMACTPPPP 24

FGFIBERGLASS 28

FGMACTWWWW 31

FGRULE290 34

E. NON-APPLICABLE REQUIREMENTS 37

APPENDICES 38

Appendix 1. Acronyms and Abbreviations..... 38

Appendix 2. Schedule of Compliance..... 39

Appendix 3. Monitoring Requirements 39

Appendix 4. Recordkeeping 39

Appendix 5. Testing Procedures 39

Appendix 6. Permits to Install..... 39

Appendix 7. Emission Calculations 40

Appendix 8. Reporting 40

AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

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

Emission Limits

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

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

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

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

Permit Shield

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

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

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

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

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

DESCRIPTION

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

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	99.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	Source-Wide	SC VI.1, VI.2, VI.4	R 336.1205(1)
2. Styrene (CAS# 100-42-5)	40.6 tpy ¹	12-month rolling time period as determined at the end of each calendar month	Source-Wide	SC VI.1, VI.3 VI.5	R 336.1225(2)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1213(3))**
2. The permittee shall maintain monthly records of the VOC emissions in tons per year based on a 12-month rolling time period.² **(R 336.1205(1))**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period styrene emission calculation records as required by SC I.2. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ **(R 336.1225)**

4. The permittee shall keep the following information on a monthly basis:
 - a. Gallons or pounds of each VOC containing or emitting material used.
 - b. VOC content, in pounds per gallon or pounds per pound, of each material used or VOC emission factors used as approved by the AQD District Supervisor..
 - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**

5. The permittee shall keep the following information on a monthly basis:
 - a. Gallons or pounds of each styrene containing or emitting material used.
 - b. Styrene content, in pounds per gallon or pounds per pound, of each material used or styrene emission factors used as approved by the AQD District Supervisor.
 - c. The styrene mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. The styrene mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUFLINERBOOTH	Coating paint system consisting of solvent wipe/tack off, spray booth, flash off booth, and oven. Coating line used to coat plastic exterior automotive parts.	01-01-1994 / 05-01-1995	FGMACTPPPP
EUBARRELMIXERS	Two 300-pound capacity barrel mixers. Note: 300 pounds of resin + 300 pounds of filler. Filler level can vary.	01-01-1972 / 04-01-1995	FGPRESSANDMIXING FGMACTWWWW
EUBATCHMIXER	2500-pound capacity batch mix tank. Note: 2500 pounds of resin + 2500 pounds of filler.	01-01-1972 / 04-01-1995	FGPRESSANDMIXING FGMACTWWWW
EUHYDPRESSES	A fiberglass parts manufacturing process with 18 hydraulic presses. Presses range in size from 50-1000 tons. Presses utilize gel-coat, fiberglass mat, and a catalyzed resin system to manufacture reinforced plastic composite parts.	01-01-1972 / 04-01-1995	FGPRESSANDMIXING FGMACTWWWW
EUBONDING	Bonding and gluing operations.	01-01-1972	FGMACTPPPP
EUSEALER	Operation(s) where sealers are applied to plastic parts.	11-01-1985	FGRULE290
EURTM	Resin Transfer Molding (RTM) operation to manufacture reinforced plastic parts. The resin is pulled into the mold by vacuum and cured under vacuum in a closed mold.	04-06-2015	FGFIBERGLASS FGMACTWWWW
EUGELCOAT	The application of gel coats will be done in the open. However, the gel coat application for large parts may be done in a booth.	04-06-2015	FGFIBERGLASS FGMACTWWWW
EUGELCOAT2	The application of gel coat done in the positive pressure gel coat booth.	06-28-2018	FGFIBERGLASS FGMACTWWWW
EUADHESIVE	Adhesive products used in manufacturing parts.	04-06-2015	FGFIBERGLASS
EUCLEANUP	Miscellaneous cleanup activities.	04-06-2015	FGFIBERGLASS FGMACTWWWW
EUMIXER	Mixer associated with reinforced plastic parts manufacturing process.	04-06-2015	FGFIBERGLASS FGMACTWWWW

**EUFLINERBOOTH
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Coating paint system consisting of solvent wipe/tack off, spray booth, flash off booth, and oven. Coating line used to coat plastic exterior automotive parts.

Flexible Group ID: FGMACTPPPP

POLLUTION CONTROL EQUIPMENT

Exhaust fabric filters on each spray booth for particulate control

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile Organic Compounds (VOC)	63.3 lbs/hour ²	Hourly	EUFLINERBOOTH	SC V.1	R 336.1702
2. VOC	8.0 tons/month ²	Monthly	EUFLINERBOOTH	SC V.1, VI.1, VI.2, VI.3, VI.5	R 336.1702
3. VOC	85.0 tons/year ²	12-month rolling	EUFLINERBOOTH	SC V.1, VI.1, VI.2, VI.3, VI.5	R 336.1702

4. The VOC concentration in the coatings used in the coating operations shall not exceed the applicable VOC emission limits specified in R 336.1632 (Rule 632), Table 66 (incorporated by reference) on a daily volume weighted average basis. All coatings applied in these operations must conform to one of the coating categories listed in Rule 632, Table 66.² (**R 336.1702(d)**)

Rule 336.1632, Table 66 VOC emission limitations for existing automobile and truck plastic parts coating lines after 12/31/1992

Coating Category	VOC lb/gal coating (minus water) emission limits
1. High bake coating—exterior and interior parts ^{1,2, A}	
(a) Prime	
(i) Flexible coating	4.5
(ii) Nonflexible coating	3.5
(b) Topcoat	
(i) Basecoat	4.3
(ii) Clearcoat	4.0
(iii) Non-basecoat/clearcoat	4.3
2. Air dried coating—exterior parts ^{1,3, A}	
(a) Prime	4.8
(b) Topcoat	
(i) Basecoat	5.0
(ii) Clearcoat	4.5
(iii) Non-basecoat/clearcoat	5.0
3. Air-dried coating—interior parts ^{1,3}	5.0
4. Touch-up and repair ³	5.2

¹For red and black coatings, the emission limitation shall be determined by multiplying by the appropriate limit in this table by 1.15.

²When 40 CFR Part 60, Appendix A, Method 24 is used to determine the VOC content of a coating, the applicable emission limitation shall be determined by adding 0.5 to the appropriate limit in this table.

³When 40 CFR Part 60, Appendix A, Method 24 is used to determine the VOC content of a coating, the applicable emission limitation shall be determined by adding 0.1 to the appropriate limit in this table.

^AAir-dried coating means a coating that is dried by the use of air or forced warm air at temperatures up to 90 degrees Celsius (194 degrees Fahrenheit). (R 336.1101(g))

5. Visible emissions from the coating operations shall not exceed a six-minute average of 0% opacity.² **(R 336.1301(1)(c))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any spray booth unless all exhaust filters are in place and operating properly.² **(R 336.1910)**
2. The disposal of spent dry filters shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.² **(R 336.1370(1))**
3. All purge solvents and coatings from all manual coating applicators used in the coating operations shall be captured and stored in closed containers and disposed in an acceptable manner in compliance with all applicable rules and regulations. The amount, in gallons, of purged solvents and coating thus collected shall be recorded for each calendar month. All such records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.² **(R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each bake oven with a temperature monitoring device.² **(R 336.1632, 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. Upon request of the AQD District Supervisor, the permittee shall verify VOC emission rates by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
VOC	40 CFR Part 60, Appendix A

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

2. The VOC content and density of any solvent-based coating or reducer, as applied and as received, shall be determined using federal Reference Test Method 24. Upon prior approval of the District Supervisor, Air Quality Division, the VOC content and density of any solvent-based coating or reducer may alternatively be determined from manufacturer's formulation data.² **(R 336.1702, R 336.2040(5)(a))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a separate record for each calendar day of the following for the coating operations:
 - a. For each coating applied:
 - i. All coating identifications and their applicable coating category as per Rule 632.
 - ii. The number of gallons of each coating and reducer, as received, used on the coating lines.
 - iii. The VOC content (in pounds per gallon of coating) of each coating and reducer, as received. All water-based materials are to include VOC content with and without water.
 - iv. The coating to reducer mix ratio, as applied.
 - v. The number of gallons of each coating, as applied, used on the coating lines.
 - vi. The number of gallons of clean-up solvent used, as well as the VOC content (in pounds per gallon of coating).
 - b. The number of gallons of clean-up solvent used, as well as the VOC content (in pounds per gallon of coating).
 - c. The number of hours of operation.
 - d. Calculations determining volume-weighted average VOC emission rate, in pounds VOC per gallon of coating, as applied, for each coating category.
 - e. VOC emission calculations determining an average hourly emission rate in pounds per hour, a calendar month emission rate in tons per month and 12-month rolling average emission rate in tons per year.

All records shall be tabulated on a calendar month basis and made available to the Air Quality Division upon request.² **(R 336.1702)**
2. The permittee shall maintain a current listing of the chemical composition of each coating and reducer, including the weight percent of each compound.² **(R 336.1201(3))**
3. The permittee shall maintain monthly records of the amount in gallons/month and VOC content in pounds/gallon of all purge and/or cleanup solvents used and reclaimed. All such records shall be kept on file and made available to the Air Quality Division upon request. **(R 336.1213(3))**
4. The permittee shall maintain a daily log of the condition of exhaust filters, and a record of the date filters are changed. **(R 336.1213(3))**

See Appendices 4 and 7

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV005	NA ²	40 ²	R 336.1201(3)
2. SV006	NA ²	40 ²	R 336.1201(3)
3. SV007	NA ²	40 ²	R 336.1201(3)
4. SV008	NA ²	40 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP for Surface Coating of Plastic Parts and Products. **(40 CFR Part 63, Subparts A and PPPP)**

Footnotes:

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

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

D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGPRESSANDMIXING	A reinforced plastic composite parts manufacturing process with 18 hydraulic presses. Presses range in size from 50-1000 tons. Presses utilize gel-coat, fiberglass mat, and a catalyzed resin system. Two 300-pound barrel mixers and a 2500-pound capacity batch mix tank are used to prepare the materials.	EUBARRELMIXERS EUBATCHMIXER EUHYDPRESSES
FGMACTPPPP	Each existing affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.	EUFLINERBOOTH EUBONDING
FGFIBERGLASS	Resin transfer molding (RTM) and the associated gelcoat application process to manufacture reinforced plastic parts.	EURTM EUGELCOAT EUGELCOAT2 EUADHESIVE EUCLEANUP EUMIXER
FGMACTWWWW	Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790. Reinforced plastic composites production includes the following operations: open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites.	EUBARRELMIXERS EUBATCHMIXER EUHYDPRESSES EURTM EUGELCOAT EUGELCOAT2 EUCLEANUP EUMIXER

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EUSEALER

**FGPRESSANDMIXING
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

The reinforced plastic composite parts manufacturing process operates with 18 hydraulic presses. Presses range in size from 50-1000 tons. Presses utilize gel-coat, fiberglass mat, and a catalyzed resin system. Two 300-pound barrel mixers and a 2500-pound capacity batch mix tank are used to prepare the materials.

Emission Units: EUBARRELMIXERS, EUBATCHMIXER, EUHYDPRESSES

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile Organic Compounds (VOC)	16.5 lbs/hour from clean-up solvents ²	Hourly	FGPRESSANDMIXING	SC V.1	R 336.1702(a)
2. VOC	17.4 tons/year from clean-up solvents ²	12-month rolling as determined at the end of each calendar month	FGPRESSANDMIXING	SC VI.3, VI.4, VI.5	R 336.1702(a)
3. Styrene	10.5 lbs/hour ¹	Hourly	FGPRESSANDMIXING	SC V.1	R 336.1225
4. Styrene	26.3 tons/year ¹	12-month rolling	FGPRESSANDMIXING	SC VI.4, VI.5	R 336.1225

II. MATERIAL LIMIT(S)

1. The permittee shall not use (mix) more than 28,000 pounds per day of polyester resin.² (**R 336.1205, R 336.1225, R 336.1702(a)**)
2. The permittee shall only use low styrene resins in the process with a maximum styrene content of 40.0 percent by weight.² (**R 336.1205, R 336.1225, R 336.1702(a)**)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Upon request of the AQD District Supervisor, the permittee shall verify VOC and Styrene emission rates by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
VOC	40 CFR Part 60, Appendix A
Styrene	40 CFR Part 63, Appendix A

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

VI. MONITORING/RECORDKEEPING

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

1. A record of the daily usage rate of polyester resin mixed shall be kept on file and made available to the Air Quality Division upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**
2. A record of the styrene content of each shipment of the polyester resin received shall be kept on file and made available to the Air Quality Division upon request.² **(R 336.1205, R 336.1225, R 336.1702(a))**
3. The permittee shall keep records for each calendar month of the amount (in pounds) of cleanup solvents purchased and sent off-site for either recycling or disposal for the process. All such records shall be kept on file and made available to the Air Quality Division upon request. Furthermore, for each calendar month, the permittee shall determine the amount of cleanup solvents lost to the atmosphere by using a mass balance method acceptable to the District Supervisor. The total amount, in pounds, of cleanup solvents lost as determined for each calendar month shall be kept on file and made available to the Air Quality Division upon request.² **(R 336.1702(a))**
4. The permittee shall calculate the actual styrene, and VOC emission rates for each calendar month, using a method acceptable to the District Supervisor, in order to demonstrate compliance with the allowable emission rates identified in SC I.2 and SC I.4. These records shall be kept on file and made available to the Air Quality Division upon request.² **(R 336.1225, R 336.1702)**
5. The permittee shall calculate the annual styrene and VOC emission rates from FGPRESSANDMIXING, in tons per year based on a 12 month rolling time period, as determined at the end of each calendar month using a method acceptable to the District Supervisor, in order to demonstrate compliance with the allowable emission rates identified in SC I.2 and SC I.4.. These records shall be kept on file and made available to the Air Quality Division upon request.² **(R 336.1225, R 336.1702)**

VII. REPORTING

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

Footnotes:

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

**FGMACTPPPP
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Each existing affected source engaged in the surface coating of plastic parts and products, identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating.

Emission Units: EUFLINERBOOTH, EUBONDING

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.16 lb per lb of coating solids	12-month rolling time period as determined at the end of each calendar month	Existing - General Use Coating	SC V.1, VI.1 through VI.4	40 CFR 63.4490(b)(1)

2. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.4490 using at least one of the following three options, which are listed in 40 CFR 63.4491(a) through (c):
 - a. Compliant material option,
 - b. Emission rate without add-on controls option, or
 - c. Emission rate with add-on controls option.

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

3. Any coating operation(s) using the compliant material option, the emission rate without add-on controls option, or the emission rate with add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.4490 at all times. **(40 CFR 63.4500(a)(1), 40 CFR 63.4500(a)(2)(i))**
4. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.4490(a) or (b), the permittee may comply separately with each subcategory emission limit or comply using one of the alternatives in 40 CFR 63.4490(c)(1) or (2). **(40 CFR 63.4490(c))**

II. MATERIAL LIMIT(S)

For the compliant materials option, the permittee shall meet the material limits specified in the following table.

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each Thinner and/or Additive	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3	40 CFR 63.4491(a)
2. Each Cleaning Material	No Organic HAP *	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3	40 CFR 63.4491(a)

* Determined according to 40 CFR 63.4541(a).

III. PROCESS/OPERATIONAL RESTRICTION(S)

- At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.4500(b))**

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), 40 CFR 63.4531)**

- The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the organic HAP content of each coating used in accordance with 40 CFR 63.4541, 40 CFR 63.4551, and/or 40 CFR 63.4561. **(40 CFR 63.4541, 40 CFR 63.4551, 40 CFR 63.4561)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

- The permittee shall keep all records required by 40 CFR 63.4530 in the format and timeframes outlined in 40 CFR 63.4531. **(40 CFR 63.4542(d), 40 CFR 63.4552(d), 40 CFR 63.4563(j))**
- The permittee shall maintain, at a minimum, the following records for each compliance period:
 - A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart PPPP, and the documentation supporting each notification report. **(40 CFR 63.4530(a))**
 - A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. **(40 CFR 63.4530(b))**
 - A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.4530(c)(1))**
 - For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. **(40 CFR 63.4530(c)(2))**

- e. For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. **(40 CFR 63.4530(c)(3))**
 - f. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. **(40 CFR 63.4530(d))**
 - g. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period. **(40 CFR 63.4530(e))**
 - h. The mass fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.4530(f))**
 - i. The information specified in 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4). **(40 CFR 63.4530(g))**
 - j. For each deviation from an emission limitation reported under 40 CFR 63.4520(a)(5) through (7), a record of the information specified in 40 CFR 63.4530(h)(1) through (4), as applicable. **(40 CFR 63.4530(h))**
- 3. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, using Equation 1 of 40 CFR 63.4541. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.4541(a). **(40 CFR 63.4542(a))**
 - 4. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period, according to 40 CFR 63.4551(a) through (g). **(40 CFR 63.4552(a))**

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. For the compliant material option, the permittee shall report a deviation, as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5), for the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a). **(40 CFR 63.4542(b))**
- 5. For the emission rate without add-on controls, the permittee shall report a deviation, as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6), if the organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490. **(40 CFR 63.4552(b))**
- 6. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4) and 40 CFR 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.4510. **(40 CFR Part 63, Subparts A and PPPP)**

7. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating operations were in compliance. **(40 CFR 63.4520(a), 40 CFR 63.4542(c), 40 CFR 63.4552(c), 40 CFR 63.4563(f))**
8. The permittee must submit the following:
 - a. Initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in 40 CFR 63.9(h) and 40 CFR 63.4510(c) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF). The applicable notification must be submitted by the deadline specified in this subpart, regardless of the method in which the reports are submitted. **(40 CFR 63.4520(e))**
 - b. On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for 1-year, whichever date is later, the semiannual compliance report required in 40 CFR 63.4520(a) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year begin submitting all subsequent reports via CEDRI. **(40 CFR 63.4520(f))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and PPPP for Surface Coating of Plastic Parts and Products. **(40 CFR Part 63, Subparts A and PPPP)**

**FGFIBERGLASS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Resin transfer molding (RTM) and gelcoat application process to manufacture reinforced plastic parts.

Emission Units: EURTM, EUGELCOAT, EUGELCOAT2, EUADHESIVE, EUCLEANUP, EUMIXER

POLLUTION CONTROL EQUIPMENT

Dry filters on spray booths

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	14.3 tpy ²	12-month rolling time period as determined at the end of each calendar month	All emission units within FGFIBERGLASS	SC VI.4	R 336.1225, R 336.1702(a)
2. Acetone (CAS# 67-64-1)	9.5 tpy ¹	12-month rolling time period as determined at the end of each calendar month	All emission units within FGFIBERGLASS	SC VI.4	R 336.1224, R 336.1225

VOC emission limits are based upon the emission factors identified in “American National Standards Institute – Estimating Emission Factors from Open Molding and Other Composite Processes,” ACMA UEF-1-2011a, EF Table 1: Unified Emission Factors of Open Molding of Composites for gel coat and Section 8 for the vacuum RTM operations (Revised and Approved: 10/5/2011).

II. MATERIAL LIMIT(S)

- The styrene content of any resin used in EURTM shall not exceed 50 percent by weight.² **(R 336.1225, R 336.1702(a))**
- The permittee shall not use more than 723,624 pounds of neat resin in EURTM per 12-month rolling time period as determined at the end of each calendar month.² **(R 336.1225, R 336.1702(a))**
- The permittee shall not exceed the styrene monomer and methyl methacrylate (MMA) content limits listed in the following table for EUGELCOAT and EUGELCOAT2.² **(R 336.1225, R 336.1702(a))**

Material ID	Maximum Styrene Content (% wt)	Maximum (MMA) (% wt)
a. White Gelcoat	26.1	5.0
b. Pigmented Gelcoat (non-white)	42.0	5.0
c. Clear Gelcoat	40.0	2.0

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste cleanup solvent(s), promoter(s), resin(s), and gel coat(s) used in FGFIBERGLASS and store them in closed containers. The permittee shall dispose of all waste cleanup solvent(s), promoter(s), resin(s), and gelcoat(s) in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any gelcoat booth unless the respective exhaust filters are each installed, maintained and operated in a satisfactory manner.² **(R 336.1301, R 336.1331, R 336.1910)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.² **(R 336.1224, R 336.1225, R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (i.e., resin, gelcoat, promoter, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall keep a separate record of the styrene and MMA monomer contents, as applicable, for each shipment of resin and gelcoat received. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a))**
4. The permittee shall keep the following information for each calendar month for FGFIBERGLASS:
 - a. The identity and amount (in pounds) of each resin (RTM), gelcoat, promoter, adhesive, and cleanup solvent used.
 - b. The styrene, MMA, and VOC content of each resin, gelcoat, adhesive, promoter, and cleanup solvent used.
 - c. The appropriate emission factors for each raw material used (The Unified Emission Factors (UEF-1-2011a) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2011 may be used for gel coat, Section 8 of UEF-1-2011a may be used for the vacuum RTM operations, or an alternate factor approved by the AQD District Supervisor may be used).
 - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - e. Acetone mass emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702(a))**

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))**

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOOTH-1	36 ²	46 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVBOOTH-2	42 ²	46 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and WWWW for Reinforced Plastic Composites Production.² **(40 CFR Part 63, Subpart A and WWWW)**

Footnotes:

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

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

FGMACTWWWW FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each new or reconstructed affected source at reinforced plastic composites production facilities as identified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5785 and 40 CFR 63.5790 that emit less than 100 tpy of HAP. Reinforced plastic composites production includes the following operations: open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

Emission Units: EUBARRELMIXERS, EUBATCHMIXER, EUHYDPRESSES EURTM, EUGELCOAT, EUGELCOAT2, EUCLEANUP, EUMIXER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.5835(c))**
2. The permittee must be in compliance at all times with the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW as follows: **(40 CFR 63.5805(c), 40 CFR 63.5835(a))**
 - a. For closed molding operation using compression/injection molding, uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting. **(40 CFR Part 63, Subpart WWWW, Table 4.1)**
 - b. The permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. **(40 CFR Part 63, Subpart WWWW, Table 4.2)**
 - c. For each HAP-containing materials storage operation, the permittee must keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. **(40 CFR Part 63, Subpart WWWW, Table 4.3)**

- d. For each mixing operation, the permittee must use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. **(40 CFR Part 63, Subpart WWWW, Table 4.6)**
- e. For each mixing operation, the permittee must close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. **(40 CFR Part 63, Subpart WWWW, Table 4.7)**
- f. For each mixing operation, the permittee must keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR Part 63, Subpart WWWW, Table 4.8)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee must keep the following records: **(40 CFR 63.5915)**
 - a. A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status. **(40 CFR 63.5915(a)(1))**
 - b. A certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63 Subpart WWWW, as applicable. **(40 CFR 63.5915(d))**
- 2. The permittee must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1) and keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.5920(a) and (b))**
- 3. The permittee must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept offsite for the remaining 3 years. **(40 CFR 63.5920(c))**
- 4. The permittee may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. Any records required to be maintained and are submitted electronically via the EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the AQD or the EPA as part of an on-site compliance evaluation. **(40 CFR 63.5920(d) and (e))**

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 all of the notifications in Table 13 of 40 CFR Part 63, Subpart WWWW that apply by the dates specified in Table 13 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5905(a))**
5. The permittee must submit semiannual compliance reports. The compliance report must contain the following information: **(40 CFR 63.5910(b) and (c))**
 - a. Company name and address. **(40 CFR 63.5910(c)(1))**
 - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.5910(c)(2))**
 - c. Date of the report and beginning and ending dates of the reporting period. **(40 CFR 63.5910(c)(3))**
 - d. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply, and there are no deviations from the requirements for work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. **(40 CFR 63.5910(c)(5))**
 - e. For each deviation from an organic HAP emissions limitation or operating limit and for each deviation from the requirements for work practice standards that occurs at an affected source, the compliance report must contain the information in (i) through (ii). **(40 CFR 63.5910(d))**
 - i. The total operating time of each affected source during the reporting period. **(40 CFR 63.5910(d)(1))**
 - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. **(40 CFR 63.5910(d)(2))**
6. The permittee must submit semiannual compliance reports to the EPA via CEDRI, which can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic report template on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>). The report must be submitted by the deadline specified in 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5912(d))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

FGRULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

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

Emission Units installed prior to December 20, 2016: EUSEALER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**

- e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in enough detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**
 - f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
 - 3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

1. A visual inspection of exhaust filters will be made prior to beginning a daily coating operation in a booth for EUFLINERBOOTH. Records of inspection and maintenance shall follow the format of "Filter Inspection and Maintenance."

Filter Inspection and Maintenance:

Filter Inspection and Maintenance				
Inspection Date	Paint Booth ID	Inspectors Initials	Operational Status Pass/Fail	Maintenance Notes

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B6202-2015. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B6202-2015 is being reissued as Source-Wide PTI No. MI-PTI-B6202-2023.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
PTI 50-15A	202200152	SVBOOTH-1 Gel Coat Booth Added	FGFIBERGLASS
PTI 50-15B	202200152	Installation and operation of fiberglass gelcoat booths.	EUGELCOAT EUGELCOAT2, FGFIBERGLASS

Appendix 7. Emission Calculations

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

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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