

**From:** [Dennis Karl](#)  
**To:** [EGLE-ROP](#)  
**Subject:** SNR B7294 - ROP Renewal Application  
**Date:** Wednesday, March 1, 2023 4:37:20 PM  
**Attachments:** [ROP Renewal Application B7294 Lear Farwell Plant \(022723\).docx](#)  
[Signed ROP Renewal Application.pdf](#)  
[B7294 Final 9-5-18 \(Mark-up\).doc](#)  
[2022 Final Consent Order.pdf](#)

---

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Attached is an ROP Renewal Application for the Lear Farwell facility along with supporting documents. Signed original printed documents have been mailed to the Bay City District Office. Please contact Dennis Karl at the phone or email listed below if you have any questions or require additional information.

--

Regards,

Dennis J. Karl  
President  
Environmental Compliance Office  
586 255-3097  
[dkarl@ecomain.com](mailto:dkarl@ecomain.com)



## RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

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

### GENERAL INSTRUCTIONS

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

### PART A: GENERAL INFORMATION

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

#### SOURCE INFORMATION

SRN B7294	SIC Code 3086	NAICS Code 326150	Existing ROP Number MI-ROP-B7294-2018	Section Number (if applicable)
Source Name LEAR CORPORATION EEDS & INTERIORS – RENOSOL SEATING FACILITY				
Street Address 505 Hoover Street				
City Farwell	State MI	ZIP Code 48622	County Clare	
Section/Town/Range (if address not available)				
Source Description Molded Polyurethane foam Seat Manufacturing				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

#### OWNER INFORMATION

Owner Name LEAR CORPORATION EEDS & INTERIORS – RENOSOL SEATING FACILITY	Section Number (if applicable)			
Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country

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

**PART A: GENERAL INFORMATION (continued)**

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

**CONTACT INFORMATION**

Contact 1 Name Dennis Karl		Title Consultant		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address) 73910 Coon Creek Rd				
City Armada	State MI	ZIP Code 48005	County Macomb	Country US
Phone number 586 255 3097 (cell phone)		E-mail address dkarl@ecomain.com		

Contact 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

**RESPONSIBLE OFFICIAL INFORMATION**

Responsible Official 1 Name Mike Walkowski		Title Operations Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 989 588 6181		E-mail address MWalkowski@lear.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:
---

**PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official**

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

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

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

Name and Title of the Responsible Official (Print or Type)	
Mike Walkowski, Operations Manager	
<i>As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.</i>	
	<u>3-2-23</u>
Signature of Responsible Official	Date

**PART C: SOURCE REQUIREMENT INFORMATION**

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

C1. Actual emissions and associated data from <b>all</b> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <b>not</b> been reported in MAERS for the most recent emissions reporting year? If <b>Yes</b> , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C3. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If <b>Yes</b> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C4. Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , VOC, lead) emissions? If <b>Yes</b> , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If <b>No</b> , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5. Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If <b>Yes</b> , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <b>must</b> be included in HAP emission calculations. If <b>No</b> , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6. Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <b>Yes</b> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7. Are any emission units subject to the federal Acid Rain Program? If <b>Yes</b> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C8. Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <b>Yes</b> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
C9. Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If <b>Yes</b> , then a copy must be submitted as part of the ROP renewal application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C10. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If <b>Yes</b> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: <b>AI-C1 &amp; AI C2</b>	





**PART F: PERMIT TO INSTALL (PTI) INFORMATION**

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

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

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

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

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

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

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

Comments:

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

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

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

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.  
 If Yes, identify the emission units in the table below. If No, go to Part H.  Yes  No  
*Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.*

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

Comments:

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

**PART H: REQUIREMENTS FOR ADDITION OR CHANGE**

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

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

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.  Consent Order AQD No. 2022-12	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
H6. Does the source propose to add, change and/or delete <b>source-wide</b> requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H7. Are you proposing to <b>streamline</b> any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

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



## RENEWABLE OPERATING PERMIT APPLICATION

### AI-001: ADDITIONAL INFORMATION

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

SRN: B7294	Section Number (if applicable):
------------	---------------------------------

1. Additional Information ID <b>AI- C1 (Potential to Emit Calculations – VOC)</b>
--

<b>Additional Information</b>
-------------------------------

2. Is This Information Confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--------------------------------------	---

<b>PTE ROP EMISSION UNITS - VOC</b>	
<b>EUSEATINGLINE#4</b>	<b>30,750 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 94.5 tons VOC/year</b>
<b>EUCANNONLINE</b>	<b>19,512 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 60 tons VOC/year</b>
<b>EUPOLYOLBLENDING</b>	<b>Polyol blending tanks are not a source of VOC emissions</b>
<b>EUPROTOTYPELINE#1</b>	<b>820 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 2.5 tons VOC/year</b>
<b>EUSMALLPARTS#1</b>	<b>7,800 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 24 tons VOC/year</b>
<b>TOTAL PTE – VOC</b>	<b>181 tons VOC/year</b>



## RENEWABLE OPERATING PERMIT APPLICATION

### AI-001: ADDITIONAL INFORMATION

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

SRN: B7294

Section Number (if applicable):

1. Additional Information ID  
**AI- C2 (Potential to Emit Calculations – HAPs)**

**Additional Information**

2. Is This Information Confidential?  Yes  No

**PTE ROP EMISSION UNITS – HAPs (TDI/MDI)**

**EUSEATINGLINE#4**

3,998,280 lbs. TDI/year x 2.5 x 10<sup>-6</sup> lbs. TDI emission/lbs. TDI = 10.0 lbs. TDI/year

**EUCANNONLINE**

2,538,590 lbs. TDI/year x 2.5 x 10<sup>-6</sup> lbs. TDI emission/lbs. TDI = 6.3 lbs. TDI/year

**EUPOLYOLBLENDING**

Polyol blending tanks are not a source of VOC emissions

**EUPROTOTYPELINE#1**

106,600 lbs.(TDI/MDI)/year x 2.5 x 10<sup>-6</sup> lbs.(TDI/MDI) emission/lbs.(TDI/MDI) = 0.3 lbs. TDI/MDI/year

**EUSMALLPARTS#1**

904,000 lbs. (TDI/MDI)/year x 2.5 x 10<sup>-6</sup> lbs.(TDI/MDI) emission/lbs.(TDI/MDI) = 2.26 lbs. TDI/MDI/year

**TOTAL PTE – HAPs**

**18.86 lbs. HAPs/year**

Page      of

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

EFFECTIVE DATE: September 5, ~~2018~~2023

ISSUED TO

**Lear Corporation EEDS & Interiors – Renosol Seating Facility**

State Registration Number (SRN): B7294

LOCATED AT

505 Hoover Street, Farwell, Michigan 48622

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B7294-~~2018~~2023

Expiration Date: September 5, ~~2023~~2028

Administratively Complete ROP Renewal Application Due Between  
March 5, ~~2022~~2027 and March 5, ~~2023~~2028

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

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-B2872-~~2018~~2023

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

Michigan Department of Environmental Quality

\_\_\_\_\_  
Chris Hare, District Supervisor

## TABLE OF CONTENTS

<b>AUTHORITY AND ENFORCEABILITY .....</b>	<b>3</b>
<b>A. GENERAL CONDITIONS .....</b>	<b>4</b>
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>B. SOURCE-WIDE CONDITIONS .....</b>	<b>11</b>
<b>C. EMISSION UNIT CONDITIONS .....</b>	<b>12</b>
EMISSION UNIT SUMMARY TABLE .....	12
EUPOLYOLBLENDING .....	14
<b>D. FLEXIBLE GROUP CONDITIONS .....</b>	<b>16</b>
FLEXIBLE GROUP SUMMARY TABLE .....	16
FGFOAMLINES .....	17
<b>E. NON-APPLICABLE REQUIREMENTS .....</b>	<b>21</b>
<b>APPENDICES .....</b>	<b>22</b>
Appendix 1. Acronyms and Abbreviations .....	22
Appendix 2. Schedule of Compliance .....	23
Appendix 3. Monitoring Requirements .....	23
Appendix 4. Recordkeeping .....	23
Appendix 5. Testing Procedures .....	23
Appendix 6. Permits to Install .....	23
Appendix 7. Emission Calculations .....	24
Appendix 8. Reporting .....	24

## AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

## 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))**

ROP No: MI-ROP-B7294-~~2018~~2023  
Expiration Date: September 5, ~~2023~~2028  
PTI No: MI-PTI-B7294-~~2018~~2023

Formatted: Tab stops: 3", Centered

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).<sup>2</sup> **(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:"<sup>2</sup> **(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.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(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).<sup>2</sup> **(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))**
- The date, location, time, and method of sampling or measurements.
  - The dates the analyses of the samples were performed.
  - The company or entity that performed the analyses of the samples.
  - The analytical techniques or methods used.
  - The results of the analyses.
  - The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

## Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(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))**
- 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).
  - 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.
  - 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.

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.<sup>2</sup> **(R 336.1912)**

#### Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
- a. The applicable requirements are included and are specifically identified in the ROP.
  - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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

#### Revisions

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

#### Reopenings

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

## Renewals

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

## Stratospheric Ozone Protection

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

## Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 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))**

ROP No: MI-ROP-B7294-~~2018~~2023  
Expiration Date: September 5, ~~2023~~2028  
PTI No: MI-PTI-B7294-~~2018~~2023

Formatted: Tab stops: 3", Centered

#### 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.<sup>2</sup> **(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.<sup>2</sup> **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.<sup>2</sup> **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> **(R 336.1201(4))**

#### Footnotes:

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

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

ROP No: MI-ROP-B7294-~~2018~~2023  
Expiration Date: September 5, ~~2023~~2028  
PTI No: MI-PTI-B7294-~~2018~~2023

Formatted: Tab stops: 3", Centered

## B. SOURCE-WIDE CONDITIONS

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

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

### C. EMISSION UNIT CONDITIONS

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

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

#### EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPOLYOLBLENDING	This blending operation consists of a batch operation of filling, blending, and un-filling polyol in a tank. (PTI No. 91-06C)	03/15/11	NA
EUSEATINGLINE#4	A multi-station line used to mold seats. The line consists of multiple stations and each contains multiple bench and bucket seat molds. The table rotates through the stations. At station one; foam is placed mechanically into the mold. The lid is immediately closed and clamped. The table rotates until it arrives at the demold station. After the finished part is removed, the mold is cleaned out and a mold release agent is applied using an HVLP spray gun or comparable technology. (PTI No. 231-15)	12/9/2014 12/18/15	FGFOAMLINES
EUCANNONLINE	A multi-station line used to mold seats. The line consists of multiple stations and each contains multiple bench and bucket seat molds. The table rotates through the stations. At station one, foam is placed mechanically into the mold. The lid is immediately closed and clamped. The table rotates until it arrives at the demold station. After the finished part is removed, the mold is cleaned out and a mold release agent is applied using an HVLP spray gun or comparable technology with equivalent transfer efficiency. (PTI No. 91-06C)	01/01/99 08/02/06 03/15/11 06/13/12	FGFOAMLINES

ROP No: MI-ROP-B7294-~~2018~~2023  
 Expiration Date: September 5, ~~2023~~2028  
 PTI No: MI-PTI-B7294-~~2018~~2023

Formatted: Tab stops: 3", Centered

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPROTOTYPELINE#1	A prototype line to support production as well as research and development (R & D) of new automobile seat foam material. The line consists of a single robotic work station at which a reactive polyurethane blend is extruded into the molds. Mold release wax is applied to the molds using an HVLP spray gun or comparable technology. (PTI No. 91-06E)	12/29/2015	FGFOAMLINES
EUSMALLPARTS#1	A mold release wax is applied manually to clean molds using an HVLP spray gun or comparable technology. The molds are conveyed to a robotic station where foam components are extruded into the mold halves which are then closed. The foam expands and cures while it is conveyed to the demold station, where the molds are opened and the cushions are removed, cleaned, and inspected. The empty molds are cleaned and conveyed to the mold release application station. (PTI No. 149-17)	02/01/18	FGFOAMLINES

**EUPOLYOLBLENDING  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

This blending operation consists of a batch operation of filling, blending, and un-filling polyol in a tank. This emission unit originated in PTI No. 91-06C and does not have any Special Conditions originating from that PTI. This emission unit is subject to 40 CFR Part 63, Subpart OOOOOO, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

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

**II. MATERIAL LIMIT(S)**

1. The permittee shall not use a material containing methylene chloride as an equipment cleaner to flush the mixhead, elsewhere as an equipment cleaner, or a mold release agent containing methylene chloride. **(40 CFR 63.11416(c))**

**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. Compliance with 40 CFR 63.11413(c) may be demonstrated using Material Safety Data Sheets and engineering calculations. **(40 CFR 63.11416(f))**
2. The permittee shall keep a compliance certification on file containing the following statements, and must be signed by a responsible official:
  - a. "This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with 63.11416(c)(1)."

ROP No: MI-ROP-B7294-~~2018~~2023  
Expiration Date: September 5, ~~2023~~2028  
PTI No: MI-PTI-B7294-~~2018~~2023

Formatted: Tab stops: 3", Centered

- b. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 63.11416(c)(2)."  
(40 CFR 63.11417(c)(1))

**VII. REPORTING**

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

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

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

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart OOOOOO for Flexible Polyurethane Foam Production and Fabrication as they apply to EUPOLYOLBLENDING.<sup>2</sup> (40 CFR Part 63, Subparts A and OOOOOO)

**Footnotes:**

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

## D. FLEXIBLE GROUP CONDITIONS

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

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

### FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGFOAMLINES	Mold release wax is applied manually to clean molds using an HVLP spray gun or comparable technology in one of four (4) production or prototype lines. Molds are then conveyed to a robotic station where foam components are extruded into the mold halves, which are then closed. The foam expands and cures while it is conveyed to the demold station where the molds are opened and the cushions are removed, cleaned, and inspected. The empty molds are cleaned and conveyed to the mold release application station for reuse.	EUSEATINGLINE#4, EUCANNONLINE, EUPROTOTYPELINE#1, EUSMALLPARTS#1

**FGFOAMLINES  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Mold release wax is applied manually to clean molds using an HVLP spray gun or comparable technology in one of four (4) production or prototype lines. Molds are then conveyed to a robotic station where foam components are extruded into the mold halves, which are then closed. The foam expands and cures while it is conveyed to the demold station, where the molds are opened and the cushions are removed, cleaned, and inspected. The empty molds are cleaned and conveyed to the mold release application station for reuse. This flexible group is subject to 40 CFR Part 63, Subpart OOOOOO, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources.

**Emission Unit:** EUSEATINGLINE#4, EUCANNONLINE, EUPROTOTYPELINE#1, EUSMALLPARTS#1

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	94.5 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUSEATINGLINE#4	SC VI.3	R 336.1702(a)
2. VOCs	60.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUCANNONLINE	SC VI.3	R 336.1702(a)
3. VOCs	2.5 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUPROTOTYPELINE#1	SC VI.3	R 336.1702(a)
4. VOCs	24.0 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUSMALLPARTS#1	SC VI.3	R 336.1702(a)

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Mold Release	6.15 lb VOC/gal (minus water)* as applied <sup>2</sup>	Instantaneous	Each emission unit in FGFOAMLINES	SC V.1	R 336.1702(a) R 336.1602(4)
2. Toluene diisocyanate	11,110 lb/day <sup>1</sup>	Calendar Day	EUCANNONLINE	SC VI.4	R 336.1224 R 336.1225

ROP No: MI-ROP-B7294-~~2018~~2023  
Expiration Date: September 5, ~~2023~~2028  
PTI No: MI-PTI-B7294-~~2018~~2023

Formatted: Tab stops: 3", Centered

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
*The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. <sup>2</sup> (R 336.1602(4))					

3. The permittee shall not use a material containing methylene chloride as an equipment cleaner to flush the mixhead, elsewhere as an equipment cleaner, or a mold release agent containing methylene chloride. (40 CFR 63.11416(c))

### III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials including waste mold release agents, purge solvents, and waste coatings from all coating applicators and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702(a))
2. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1213(3))

### IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each emission unit in FGFOAMLINES with high volume low pressure (HVLP) spray guns or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.<sup>2</sup> (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. The permittee shall determine the VOC content, water content, and density of any mold release agent, as applied and as received, using Federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

### VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each mold release agent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturers formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702, R 336.1901, 40 CFR 63.11416(f))
3. The permittee shall keep the following information on a monthly basis for each emission unit in FGFOAMLINES:
  - a. Gallons (with water) of each mold release agent used;
  - b. VOC content (minus water and with water) of each mold release agent as applied;
  - 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 in an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> (R 336.1225, R 336.1702, R 336.1901)

4. The permittee shall keep daily usage records of toluene diisocyanate in pounds per calendar day for EUCANNONLINE. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1224, R 336.1225)
5. The permittee shall keep a compliance certification on file containing the following statements, and must be signed by the responsible official:
  - a. "This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with 63.11416(c)(1)."
  - b. "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with 63.11416(c)(2)."(40 CFR 63.11417(c)(1))

See Appendix 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 Dimensions (inches)	Minimum Height Above Ground (feet)	Equipment	Underlying Applicable Requirements
1. SV-A4-A (Mold Release)	36 <sup>2</sup>	50 <sup>2</sup>	EUSEATINGLINE#4	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-A4-B (Robotic Mold Injection)	42 <sup>2</sup>	50 <sup>2</sup>	EUSEATINGLINE#4	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV-A4-C (Robotic Mold Injection)	40 <sup>2</sup>	50 <sup>2</sup>	EUSEATINGLINE#4	R 336.1225, 40 CFR 52.21(c) & (d)

ROP No: MI-ROP-B7294-~~2018~~2023  
 Expiration Date: September 5, ~~2023~~2028  
 PTI No: MI-PTI-B7294-~~2018~~2023

Formatted: Tab stops: 3", Centered

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Equipment	Underlying Applicable Requirements
4. SV-CAN-A	36 <sup>2</sup>	58 <sup>2</sup>	EUCANNONLINE	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
5. SV-CAN-B	36 <sup>2</sup>	46 <sup>2</sup>	EUCANNONLINE	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
6. SV-CAN-C	36 <sup>2</sup>	46 <sup>2</sup>	EUCANNONLINE	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
7. SV-A1-A	36 <sup>2</sup>	30 <sup>2</sup>	EUPROTOTYPELINE#1	R 336.1225, 40 CFR 52.21(c) & (d)
8. SV-SP-A (Mold Release Application)	18 <sup>2</sup>	50 <sup>2</sup>	EUSMALLPARTS#1	R 336.1225, 40 CFR 52.21(c) & (d)
9. SV-SP-B (Mold Filling and Demolding)	30 <sup>2</sup>	50 <sup>2</sup>	EUSMALLPARTS#1	R 336.1225, 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart OOOOOO for Flexible Polyurethane Foam Production and Fabrication as they apply to FGFOAMLINES.<sup>2</sup> **(40 CFR Part 63, Subparts A and OOOOOO)**

**Footnotes:**

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

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

ROP No: MI-ROP-B7294-~~2018~~2023  
Expiration Date: September 5, ~~2023~~2028  
PTI No: MI-PTI-B7294-~~2018~~2023

Formatted: Tab stops: 3", Centered

### 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 <sub>2</sub> e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H <sub>2</sub> S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO <sub>x</sub>	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
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 <sub>2</sub>	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		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

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

## Appendix 5. Testing Procedures

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

## Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B7294-2013. 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-B6257-2013 is being reissued as Source-Wide PTI No. MI-PTI-B6257-2018.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
149-17*	Production line for head rests, arm rests, and other types of small foam seating parts.	EUSMALLPARTS#1
91-06E*	A prototype line to support production as well as research and development of new automobile seat foam material.	EUPROTOTYPELINE#1
231-15	Add another stack to improve the capture efficiency of the exhaust system for EUSEATINGLINE#4 and remove references for EUSEATINGLINE#1 and EUSEATINGLINE#2.	EUSEATINGLINE#4
91-06D	Production line to replace two previous seating lines, EUSEATINGLINE#1 and EUSEATINGLINE#2.	EUSEATINGLINE#4

## Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUSEATINGLINE#4, EUCANNONLINE, EUPROTOTYPELINE#1 and EUSMALLPARTS#1.

Total/mass emissions are based on the total gallons of each mold release agent applied and the VOC content (weight percent).

$$\text{Total VOC} = \text{Weight\% VOC (in lb/gallon)} \times \text{Total no. gallons of mold release applied}$$

## Appendix 8. Reporting

### A. Annual, Semiannual, and Deviation Certification Reporting

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

### B. Other Reporting

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

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
OFFICE OF THE DIRECTOR

In the matter of administrative proceedings  
against **LEAR CORPORATION**, a company,  
organized under the laws of the State of  
Michigan and doing business at 505 Hoover  
Street in the City of Farwell, County of Clare,  
State of Michigan

---

AQD No. 2022-12

SRN: B7294

STIPULATION FOR ENTRY OF FINAL ORDER  
BY CONSENT

This proceeding resulted from allegations by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) against Lear Corporation (Company), a corporation organized under the laws of the State of Michigan and doing business at 505 Hoover Street, City of Farwell, County of Clare, State of Michigan, with State Registration Number (SRN) B7294. EGLE alleges that the Company is in violation of Mich Admin Code, R 336.1213 (Rule 213) and R 336.1702 (Rule 702); and the conditions of Renewable Operating Permit (ROP) No. MI-ROP-B7294-2018. Specifically, EGLE alleges that the Company exceeded the volatile organic compound (VOC) emission limit from the Foam Lines (FGFOAMLINES) for five (5) months in 2019; exceeded the VOC content limit for the mold release; failed to verify the VOC content, water content, or density of the mold release agent using the proper method; failed to receive written approval from the AQD to use the manufacturer's formulation data for the mold release agent; failed to submit the correct reporting period dates for the July 1 – December 21, 2017, semi-annual monitoring and deviation report; failed to timely submit the 2017 annual ROP compliance certification; and failed to timely submit the July 1 – December 21, 2017, and the January 1 – June 30, 2019, semi-annual monitoring and deviation reports, as cited herein and in the Violation Notices dated April 9, 2018, December 19, 2019, September 27, 2019, and April 5, 2021. The AQD alleged in a VN dated April 15, 2021, that the Company exceeded the VOC emission limit from the Foam Lines (FGFOAMLINES) for five (5) months in 2019. On August 17, 2021, the Company provided information demonstrating that the VOC emission limit from FGFOAMLINES was not exceeded and the error was due to incorrect calculations that included totes of release agent that were not used at the facility. The Company and EGLE stipulate to the termination of this proceeding by entry of a Stipulation for Entry of a Final Order by Consent (Consent Order).

The Company and EGLE stipulate as follows:

1. The Natural Resources and Environmental Protection Act (NREPA) MCL 324.101 *et seq.*, is an act that controls pollution to protect the environment and natural resources in this State.
2. Article II, Pollution Control, Part 55 of the NREPA (Part 55), MCL 324.5501 *et seq.*, provides for air pollution control regulations in this State.
3. Executive Order 2019-06 renamed the Michigan Department of Environmental Quality as EGLE, and EGLE has all statutory authority, powers, duties, functions, and responsibilities to administer and enforce all provisions of Part 55 and Part 115.
4. The EGLE Director has delegated authority to the Director of the AQD (AQD Director) to enter into this Consent Order.
5. The termination of this matter by a Consent Order pursuant to Section 5528 of Part 55, MCL 324.5528, is proper and acceptable.
6. The Company and EGLE agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the Company that the law has been violated.
7. This Consent Order becomes effective on the date of execution (effective date of this Consent Order) by the AQD Director.
8. The Company shall achieve compliance with the aforementioned regulations in accordance with the requirements contained in this Consent Order.

#### COMPLIANCE PROGRAM AND IMPLEMENTATION SCHEDULE

9. Permit
  - A. On and after the effective date of this Consent Order, the Company shall comply with the VOC emission limit of 60.0 tpy as specified in FGFOAMLINES, Condition I.2 of MI-ROP-B7294-2018, as amended.
  - B. On and after the effective date of this Consent Order, the Company shall comply with the VOC material limit of 6.15 lb VOC/gal as specified in FGFOAMLINES, Condition II.1 of MI-ROP-B7294-2018, as amended.
  - C. On and after the effective date of this Consent Order, the Company shall determine the VOC content, water content, and density of any mold release agent as specified in FGFOAMLINES, Condition V.1 of MI-ROP-B7294-2018, as amended.

D. On and after the effective date of this Consent Order, the Company shall timely submit the certification of compliance, as specified in General Condition No. 20 of MI-ROP-B7294-2018, as amended.

E. On and after the effective date of this Consent Order, the Company shall timely submit accurate semi-annual monitoring and deviation reports, as specified in General Condition No. 23 of MI-ROP-B7294-2018, as amended.

#### SUPPLEMENTAL ENVIRONMENTAL PROJECT

10. In addition to the civil fine in this Consent Order for the violations alleged in the Violation Notice, the Company agrees to undertake the Supplemental Environmental Project (SEP) described in Exhibit A which is attached, incorporated by reference, and made an enforceable part of this Consent Order. Performance of the SEP will benefit the environment and the Company agrees to implement the SEP in accordance with the details specified in Exhibit A and in accordance with the following terms and conditions:

A. The Company certifies that any economic benefit, including tax abatement(s), tax credit(s), or similar tax relief, that the Company will realize as a result of the SEP is detailed in Exhibit A.

B. The plan included as Exhibit A contains schedules, including specific dates for the implementation of the SEP. The Company shall fully implement all aspects of the SEP within the specified schedule.

C. The Company further certifies that the Company has not received, and is not presently negotiating to receive, a credit for the SEP as part of any other enforcement action or any grant from the state, United States Environmental Protection Agency, or any other entity. The Company also certifies that the Company will not seek tax benefits following completion of the SEP.

D. In the event the Company fails to fully and completely implement the SEP as provided herein to the reasonable satisfaction of EGLE, EGLE will provide written notice to the Company describing the nature of the deficiency. The Company shall have thirty (30) days from receipt of the notice to submit documentation to EGLE demonstrating that the deficiency has been corrected. In the event the deficiency is not corrected to the satisfaction of EGLE, then EGLE will notify the Company, and the Company shall be in violation of this Consent Order and will be required to pay a stipulated penalty of \$31,907.00. The amount of the stipulated penalty may be reduced or waived by EGLE if the Company made good faith and timely efforts to complete the SEP. Payment

of a stipulated penalty under the terms of this subparagraph shall satisfy the Company's obligation to complete the SEP under this Consent Order. Payment of any stipulated penalty shall be made as outlined in paragraph 14.

E. The Company agrees that any public statement, oral or written, making reference to the SEP shall include the following language: "This project was undertaken in connection with the settlement of an enforcement action taken by EGLE for violations of air quality law."

F. No later than thirty (30) days after the completion of all activities specified in Exhibit A, the Company shall submit written certification of completion of the SEP to the AQD Bay City District Supervisor demonstrating that all SEP activities specified in Exhibit A have been completed in accordance with the terms and conditions of this Consent Order and Exhibit A. The certification shall be accompanied by appropriate documentation (such as invoices, receipts, or tax statements) to verify the total expenditure made by the Company as a result of implementing the activities specified under Exhibit A, and to the extent possible, documentation supporting the quantification of benefits associated with the SEP and an explanation of how such benefits were measured or estimated. It shall be the sole determination of EGLE whether the Company has completely implemented the activities specified in Exhibit A of this Consent Order.

#### GENERAL PROVISIONS

11. This Consent Order in no way affects the Company's responsibility to comply with any other applicable state, federal, or local laws or regulations, including without limitation, any amendments to the federal Clean Air Act, 42 USC 7401 *et seq.*, Part 55, or their rules and regulations, or to the State Implementation Plan.

12. This Consent Order constitutes a civil settlement and satisfaction as to the resolution of the violations specifically addressed herein; however, it does not resolve any criminal action that may result from these same violations.

13. Within thirty (30) days after the effective date of this Consent Order, the Company shall pay to the General Fund of the State of Michigan, in the form of a check made payable to the "State of Michigan" and mailed to the Michigan Department of Environment, Great Lakes, and Energy, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157, a settlement amount of \$10,636.00, which includes the AQD costs for investigation and enforcement. This total settlement amount shall be paid within thirty (30) days after the effective date of this Consent Order. To ensure proper credit, all payments made pursuant to this Consent Order shall

include the "Payment Identification Number AQD40285" on the front of the check and/or in the cover letter with the payment. This settlement amount is in addition to any fees, taxes, or other fines that may be imposed on the Company by law.

14. On and after the effective date of this Consent Order, if the Company fails to comply with paragraph 9.A, 9.B, or 9.C of this Consent Order, the Company is subject to a stipulated fine of up to \$2,500.00 per violation per day. On and after the effective date of this Consent Order, if the Company fails to comply with paragraphs 9.D or 9.E of this Consent Order, the Company is subject to a stipulated fine of up to \$1,000.00 per violation per day. The amount of the stipulated fines imposed pursuant to this paragraph shall be within the discretion of EGLE. Stipulated fines submitted under this Consent Order shall be by check, payable to the State of Michigan within thirty (30) days after written demand and shall be mailed to the Michigan Department of Environment, Great Lakes, and Energy, Accounting Services Division, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments shall include the "Payment Identification Number AQD40285-S" on the front of the check and/or in the cover letter with the payment. Payment of stipulated fines shall not alter or modify in any way the Company's obligation to comply with the terms and conditions of this Consent Order.

15. The AQD, at its discretion, may seek stipulated fines or statutory fines for any violation of this Consent Order which is also a violation of any provision of applicable federal and state law, rule, regulation, permit, or EGLE administrative order. However, the AQD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.

16. To ensure timely payment of the settlement amount assessed in paragraph 13 and any stipulated fines assessed pursuant to paragraph 14 of this Consent Order, the Company shall pay an interest penalty to the State of Michigan each time it fails to make a complete or timely payment under this Consent Order. The interest penalty shall be determined at a rate of twelve percent (12%) per year compounded annually, using the full increment of amount due as principal, calculated from the due date specified in this Consent Order until the date that delinquent payment is finally paid in full. Payment of an interest penalty by the Company shall be made to the State of Michigan in accordance with paragraph 13 of this Consent Order. Interest payments shall be applied first towards the most overdue amount or outstanding interest penalty owed by the Company before any remaining balance is applied to subsequent payment amount or interest penalty.

17. The Company agrees not to contest the legal basis for the settlement amount assessed pursuant to paragraph 13. The Company also agrees not to contest the legal basis for any stipulated fines assessed pursuant to paragraph 14 of this Consent Order but reserves the right to dispute in a

court of competent jurisdiction the factual basis upon which a demand by EGLE of stipulated fines is made. In addition, the Company agrees that said fines have not been assessed by EGLE pursuant to Section 5529 of Part 55, MCL 324.5529, and therefore are not reviewable under Section 5529 of Part 55.

18. This compliance program is not a variance subject to the 12-month limitation specified in Section 5538 of Part 55, MCL 324.5538.

19. This Consent Order shall remain in full force and effect for a period of at least three (3) years. Thereafter, this Consent Order shall terminate only upon written notice of termination issued by the AQD Director. Prior to issuance of a written notice of termination, the Company shall submit a request, to the AQD Director at the Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760, consisting of a written certification that the Company has fully complied with all the requirements of this Consent Order and has made all payments including all stipulated fines required by this Consent Order. Specifically, this certification shall include: (i) the date of compliance with each provision of the compliance program and the date any payments or stipulated fines were paid; (ii) a statement that all required information has been reported to the AQD Bay City District Supervisor; (iii) confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facility; and, (iv) such information as may be requested by the AQD Director.

20. In the event Lear Corporation sells or transfers the facility, with SRN B7294, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within thirty (30) calendar days, the Company shall also notify the Bay City District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. As a condition of the sale, Lear Corporation must obtain the consent of the purchaser and/or transferee, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the AQD Bay City District Supervisor within thirty (30) days after assuming the obligations of this Consent Order.

21. Prior to the effective date of this Consent Order and pursuant to the requirements of Sections 5511 and 5528(3) of Part 55, MCL 324.5511 and MCL 324.5528(3), the public was notified of a 30-day public comment period and was provided the opportunity for a public hearing.

22. Section 5530 of Part 55, MCL 324.5530, may serve as a source of authority but not a limitation under which this Consent Order may be enforced. Further, Part 17 of the NREPA,

MCL 324.1701 *et seq.*, and all other applicable laws and any other legal basis or applicable statute may be used to enforce this Consent Order.

23. The Company hereby stipulates that entry of this Consent Order is a result of an action by EGLE to resolve alleged violations of its facility located at 505 Hoover Street, City of Farwell, County of Clare, State of Michigan. The Company further stipulates that it will take all lawful actions necessary to fully comply with this Consent Order, even if the Company files for bankruptcy in the future. The Company will not seek discharge of the settlement amount and any stipulated fines imposed hereunder in any future bankruptcy proceedings, and the Company will take necessary steps to ensure that the settlement amount and any future stipulated fines are not discharged. The Company, during and after any future bankruptcy proceedings, will ensure that the settlement amount and any future stipulated fines remain an obligation to be paid in full by the Company to the extent allowed by applicable bankruptcy law.

The undersigned certifies that he/she is fully authorized by the Company to enter into this Consent Order and to execute and legally bind the Company to it.

**LEAR CORPORATION**

Michael Walkowski Director of Global Foam  
Print Name and Title

[Signature]  
Signature

7-20-22  
Date

Subscribed and sworn to by the above signatory before me on this 20<sup>th</sup> day of July, 2022.

[Signature]  
Notary Public Signature

DAWN A. SWETZ  
NOTARY PUBLIC - STATE OF MICHIGAN  
COUNTY OF CLARE  
My Commission Expires July 18, 2028  
Acting in the County of Clare

Dawn A. Swetz  
Notary Public Printed Name

7-18-2028  
My Commission Expires  
Approved as to Form:

*Clare*

Approved as to Content:

[Signature]  
Mary Ann Dolehanty, Director  
AIR QUALITY DIVISION  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES,  
AND ENERGY  
Dated: 7-28-2022

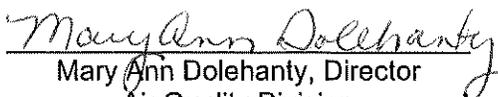
[Signature]  
Margaret Bettenhausen, Asst. Attorney General  
AIR AND WATER SECTION  
ENVIRONMENT, NATURAL RESOURCES,  
AND AGRICULTURE DIVISION  
DEPARTMENT OF ATTORNEY GENERAL  
Dated: 7-27-22

FINAL ORDER

The Director of the Air Quality Division having had opportunity to review this Consent Order and having been delegated authority to enter into Consent Orders by the Director of the Michigan Department of Environment, Great Lakes, and Energy pursuant to the provisions of Part 55 of the NREPA and otherwise being fully advised on the premises,

HAS HEREBY ORDERED that this Consent Order is approved and shall be entered in the record of EGLE as a Final Order.

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

  
Mary Ann Dolehanty, Director  
Air Quality Division

Effective Date: 7-28-2022

**From:** [Dennis Karl](#)  
**To:** [Orent, Kelly \(EGLE\)](#); [Ahammod, Shamim \(EGLE\)](#)  
**Subject:** Lear Farwell ROP Application Update for PTI 41-24 (SRN:B7294)  
**Date:** Wednesday, July 10, 2024 6:09:41 PM  
**Attachments:** [2024 ROP Application modified for PTI 41-24.pdf](#)

---

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hello Kelly and Shamim, Attached are the signed ROP Application forms updated as per your instructions Shamim. The version with the 'wet' signature is in the mail to Gina in Bay City.

Thanks

Dennis

--

Regards,

Dennis J. Karl  
President  
Environmental Compliance Office  
586 255-3097  
[dkarl@ecomain.com](mailto:dkarl@ecomain.com)



Virus-free [www.avast.com](http://www.avast.com)



## RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

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

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

Form Type <b>C-001</b>	SRN B7294
------------------------	-----------

Stationary Source Name Lear Corporation EEDS & Interiors – Renosol Seating Facility	
City Farwell	County Clare

<b>SUBMITTAL CERTIFICATION INFORMATION</b>	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to _____	
3. Submittal Media <input checked="" type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.	
<b>AI</b>	

<b>CONTACT INFORMATION</b>	
Contact Name Dennis Karl	Title Contractor
Phone number 586 255 3097	E-mail address dkarl@ecomain.com

<b>This form must be signed and dated by a Responsible Official.</b>				
Responsible Official Name Mike Walkowski			Title Operations Manager	
Mailing address 505 Hoover Street				
City Farwell	State MI	ZIP Code 48622	County Clare	Country US
<b>As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.</b>				
_____ Signature of Responsible Official			_____ Date	



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

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

1. SRN    B7294	2. ROP Number    MI-ROP-B7294-2018	3. County    Clare
4. Stationary Source Name    Lear Corporation EEDS & Interiors – Renosol Seating Facility		
5. Location Address    505 Hoover Street		6. City    Farwell
<p>7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i></p> <p><input type="checkbox"/> <b>Rule 215(1) Notification of change.</b>    <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> <b>Rule 215(2) Notification of change.</b>    <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> <b>Rule 215(3) Notification of change.</b>    <i>Complete Items 8 – 11 and 14</i></p> <p><input type="checkbox"/> <b>Rule 215(5) Notification of change.</b>    <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> <b>Rule 216(1)(a)(i)-(iv) Administrative Amendment.</b>    <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> <b>Rule 216(1)(a)(v) Administrative Amendment.</b>    <i>Complete Items 8 – 14. Results of testing, monitoring &amp; recordkeeping must be submitted. See detailed instructions.</i></p> <p><input checked="" type="checkbox"/> <b>Rule 216(2) Minor Modification.</b>    <i>Complete Items 8 – 12 and 14</i></p> <p><input type="checkbox"/> <b>Rule 216(3) Significant Modification.</b>    <i>Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.</i></p> <p><input type="checkbox"/> <b>Rule 216(4) State-Only Modification.</b>    <i>Complete Items 8 – 12 and 14</i></p>		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> <u>04/17/2024</u>		9. Change in emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i></p> <p>New equipment installed (EUSEATINGLINE#6) and existing equipment (EUCANNONLINE) to be removed. Additional emission information included on AI-001 attached to revised ROP application submitted 07/08/2024.</p>		
11. New Source Review Permit(s) to Install (PTI) associated with this application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
If Yes, enter the PTI Number(s) <u>41-24</u> -    -    -    -		
<p>12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i></p> <p>a. Is the change identified above in compliance with the associated applicable requirement(s)?    <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)?    <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p> <p>c. If the change includes a future applicable requirement(s), will timely compliance be achieved?    <input checked="" type="checkbox"/> Yes    <input type="checkbox"/> No</p>		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		<b>AI</b>
14. Contact Name Dennis Karl	Telephone No. 586 255 3097	E-mail Address dkarl@ecomain.com
15. This submittal also updates the ROP renewal application submitted on <u>07/08/2024</u> <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A

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



## RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

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

### GENERAL INSTRUCTIONS

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

### PART A: GENERAL INFORMATION

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

#### SOURCE INFORMATION

SRN B7294	SIC Code 3086	NAICS Code 326150	Existing ROP Number MI-ROP-B7294-2018	Section Number (if applicable)
Source Name LEAR CORPORATION EEDS & INTERIORS – RENOSOL SEATING FACILITY				
Street Address 505 Hoover Street				
City Farwell		State MI	ZIP Code 48622	County Clare
Section/Town/Range (if address not available)				
Source Description Molded Polyurethane foam Seat Manufacturing				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

#### OWNER INFORMATION

Owner Name LEAR CORPORATION EEDS & INTERIORS – RENOSOL SEATING FACILITY				Section Number (if applicable)	
Mailing address ( <input checked="" type="checkbox"/> check if same as source address)					
City		State	ZIP Code	County	Country
<input type="checkbox"/> Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.					

**PART A: GENERAL INFORMATION (continued)**

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

**CONTACT INFORMATION**

Contact 1 Name Dennis Karl		Title Consultant		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address) 73910 Coon Creek Rd				
City Armada	State MI	ZIP Code 48005	County Macomb	Country US
Phone number 586 255 3097 (cell phone)		E-mail address dkarl@ecomain.com		

Contact 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

**RESPONSIBLE OFFICIAL INFORMATION**

Responsible Official 1 Name Mike Walkowski		Title Operations Manager		
Company Name & Mailing address ( <input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 989 588 6181		E-mail address MWalkowski@lear.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address ( <input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

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

**PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official**

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

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

**Compliance Statement**

This source is in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.  Yes  No

This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.  Yes  No

This source will meet in a timely manner applicable requirements that become effective during the permit term.  Yes  No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

**Name and Title of the Responsible Official (Print or Type)**  
 Mike Walkowski, Operations Manager

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

  
 Signature of Responsible Official

7-10-24  
 Date

**PART C: SOURCE REQUIREMENT INFORMATION**

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

C1. Actual emissions and associated data from <b>all</b> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <b>not</b> been reported in MAERS for the most recent emissions reporting year? If <b>Yes</b> , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C3. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If <b>Yes</b> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C4. Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NO <sub>x</sub> , PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , VOC, lead) emissions? If <b>Yes</b> , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If <b>No</b> , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5. Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If <b>Yes</b> , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <b>must</b> be included in HAP emission calculations. If <b>No</b> , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6. Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <b>Yes</b> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7. Are any emission units subject to the federal Acid Rain Program? If <b>Yes</b> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C8. Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If <b>Yes</b> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
C9. Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If <b>Yes</b> , then a copy must be submitted as part of the ROP renewal application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C10. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If <b>Yes</b> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-C1 & AI-C2	



**PART E: EXISTING ROP INFORMATION**

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

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP?  Yes  No

If Yes, identify changes and additions on Part F, Part G and/or Part H.

E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identify the stack(s) that was/were not reported on applicable MAERS form(s).  Yes  No

E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI?  Yes  No

If Yes, complete Part F with the appropriate information.

E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.  Yes  No

Comments:

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

**PART F: PERMIT TO INSTALL (PTI) INFORMATION**

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

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

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed
41-24	FGFOAMLINES	New foam seating line EUFOAMLIN#6	4/17/24

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

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

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

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

Comments:

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

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

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

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

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

Yes  No

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

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

Comments:

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

**PART H: REQUIREMENTS FOR ADDITION OR CHANGE**

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

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

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.  Consent Order AQD No. 2022-12	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
H6. Does the source propose to add, change and/or delete <b>source-wide</b> requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H7. Are you proposing to <b>streamline</b> any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

<p>H8. Does the source propose to add, change and/or delete <b>emission limit</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p style="padding-left: 40px;">New equipment installed (EUSEATINGLINE#6) and existing equipment (EUCANNONLINE) to be removed.</p>	
<p>H9. Does the source propose to add, change and/or delete <b>material limit</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H10. Does the source propose to add, change and/or delete <b>process/operational restriction</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H11. Does the source propose to add, change and/or delete <b>design/equipment parameter</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H12. Does the source propose to add, change and/or delete <b>testing/sampling</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H13. Does the source propose to add, change and/or delete <b>monitoring/recordkeeping</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>H14. Does the source propose to add, change and/or delete <b>reporting</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

New equipment installed (EUSEATINGLINE#6) with two (2) new stacks and existing equipment to be removed (EUCANNONLINE) with three (3) stacks.

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

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



**RENEWABLE OPERATING PERMIT APPLICATION  
AI-001: ADDITIONAL INFORMATION**

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

SRN: B7294	Section Number (if applicable):
------------	---------------------------------

1. Additional Information ID  
**AI- C1 (Potential to Emit Calculations – VOC)**

**Additional Information**

2. Is This Information Confidential?  Yes  No

**PTE ROP EMISSION UNITS - VOC**

**EUSEATINGLINE#4**

30,750 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 94.5 tons VOC/year

**EUSEATINGLINE#6**

Waterborne Wax  
16,000 gal/year x 0.8 lbs. VOC/gal x 1 ton/2000 lbs. = 6.4 tons VOC/year

Naphtha Wax  
+ 24,000 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 73.8 tons VOC/year

80.2 tons VOC/year

**EUCANNONLINE**

~~19,512 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 60 tons VOC/year~~

**EUPOLYOLBLENDING**

Polyol blending tanks are not a source of VOC emissions

**EUPROTOTYPELINE#1**

820 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 2.5 tons VOC/year

**EUSMALLPARTS#1**

7,800 gal/year x 6.15 lbs. VOC/gal x 1 ton/2000 lbs. = 24 tons VOC/year

**TOTAL PTE – VOC** 201.2 tons VOC/year

Page of



**RENEWABLE OPERATING PERMIT APPLICATION  
AI-001: ADDITIONAL INFORMATION**

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

SRN: B7294

Section Number (if applicable):

1. Additional Information ID  
**AI- C2 (Potential to Emit Calculations – HAPs)**

**Additional Information**

2. Is This Information Confidential?  Yes  No

**PTE ROP EMISSION UNITS – HAPs (TDI/MDI)**

**EUSEATINGLINE#4**

3,998,280 lbs. TDI/year x 2.5 x 10<sup>-6</sup> lbs. TDI emission/lbs. TDI = 10.0 lbs. TDI/year

**EUSEATINGLINE#6**

2,200,000 lbs. TDI/year x 2.5 x 10<sup>-6</sup> lbs. TDI emission/lbs. TDI = 5.5 lbs. TDI/year

**EUCANNONLINE**

2,538,590 lbs. TDI/year x 2.5 x 10<sup>-6</sup> lbs. TDI emission/lbs. TDI = 6.3 lbs. TDI/year

**EUPOLYOLBLENDING**

Polyol blending tanks are not a source of VOC emissions

**EUPROTOTYPELINE#1**

106,600 lbs.(TDI/MDI)/year x 2.5 x 10<sup>-6</sup> lbs.(TDI/MDI) emission/lbs.(TDI/MDI) = 0.3 lbs. TDI/MDI/year

**EUSMALLPARTS#1**

904,000 lbs. (TDI/MDI)/year x 2.5 x 10<sup>-6</sup> lbs.(TDI/MDI) emission/lbs.(TDI/MDI) = 2.26 lbs. TDI/MDI/year

**TOTAL PTE – HAPs**

18.06 lbs. HAPs/year

Page of