



Michigan Department of Environmental Quality  
Air Quality Division

EFFECTIVE DATE: February 17, 2010

ISSUED TO

General Motors Hamtramck

State Registration Number (SRN): M4199

LOCATED AT

2500 E. General Motors Blvd. Detroit, Michigan 48211

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-M4199-2010

Expiration Date: February 17, 2015

Administratively Complete ROP Renewal Application Due Between  
August 17, 2013 and August 17, 2014

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-M4199-2010

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

Teresa Seidel, Southeast Michigan District Supervisor

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## AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

**STATE OF MICHIGAN  
RENEWABLE OPERATING PERMIT**

**SECTION 1**

**General Motors  
Hamtramck Assembly Plant**

SRN:M4199

LOCATED AT

2500 E. General Motors Blvd.

Permit Number: MI-ROP-M4199-2010

Effective Date: February 17, 2010

Expiration Date: February 17, 2015

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source- wide PTI No. MI-PTI-M4199-2010 pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

### General Provisions

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

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

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

### Equipment & Design

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

### Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
  - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
  - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<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). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

## Monitoring/Recordkeeping

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

## Certification & Reporting

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

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

## Permit Shield

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

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

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

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

## Revisions

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

## Reopenings

- 34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
  - 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(7))**

## Stratospheric Ozone Protection

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

## Risk Management Plan

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

## Emission Trading

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

### Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. <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, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. <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).

## **B. SOURCE-WIDE CONDITIONS**

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

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

## SOURCE-WIDE CONDITIONS

### POLLUTION CONTROL EQUIPMENT

#### I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-----------|-------|---------------------------------|-----------|----------------------------|------------------------------------|
| 1.NA      | NA    | NA                              | NA        | NA                         | NA                                 |

#### II. MATERIAL LIMIT(S)

| Material | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|----------|-------|---------------------------------|-----------|----------------------------|------------------------------------|
| 1.NA     | NA    | NA                              | NA        | NA                         | NA                                 |

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

1. The permittee shall not produce more than 78.5 jobs per hour, as averaged over the hours of operation for each calendar month and determined at the end of each calendar month. A job shall be defined as a fully assembled vehicle leaving the assembly line.<sup>2</sup> (R°336.1220)
2. The permittee shall not produce more than 337,500 jobs per year, as determined at the end of each calendar year.<sup>2</sup> (R°336.1220)

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

1. NA

#### V. TESTING/SAMPLING

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

1. NA

See Appendix 5

#### VI. MONITORING/RECORDKEEPING

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

1. Permittee shall maintain daily and monthly records of the hours of operation for the assembly line.<sup>2</sup> (R°336.1220)
2. Permittee shall maintain records of the daily and monthly number of jobs produced for the assembly line.<sup>2</sup> (R°336.1220)
3. Permittee shall calculate and maintain records of the hourly averaged jobs per hour, as determined at the end of each calendar month. (R°336.1213(3))

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:

| <b>Stack &amp; Vent ID</b> | <b>Maximum Exhaust Dimensions (inches)</b> | <b>Minimum Height Above Ground (feet)</b> | <b>Underlying Applicable Requirements</b> |
|----------------------------|--|---|---|
| 1. NA                      | NA   | NA  | NA  |

**IX. OTHER REQUIREMENT(S)**

- 1. NA

**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).

### 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<br>(Including Process Equipment & Control Device(s))  | Installation Date/<br>Modification Date           | Flexible Group ID |
|----------------------|---|---|-------------------|
| EUPRETREATMENT       | Surface preparation for the painting applications to follow. Vehicle bodies are cleaned with detergent and rinsed. Microcrystals are applied to vehicle bodies for corrosion resistance and enhanced paint adhesion. There are not any add-on controls associated with this emission unit.  | 5/19/1981<br>1/17/1989                            | NA                |
| EUELPOSYSTEM         | An electrocoat dip tank followed by an electrocoat curing oven. There are not any add on controls associated with this emission unit.   | 5/19/1981<br>11/15/1982<br>1/17/1989              | NA                |
| EUPRIMERSURFACE<br>R | A guidecoat (primer surfacer) spray booth followed by a curing oven. The solventborne primersurfacer is applied manually or automatically with air atomized or electrostatic spray guns. The guidecoat booth is equipped with a downdraft water wash system to control particulate emissions from paint overspray. VOC emissions from the curing oven are controlled by a thermal oxidizer. | 5/19/1981<br>11/15/1982<br>1/17/1989<br>5/19/1993 | NA                |

| Emission Unit ID              | Emission Unit Description<br>(Including Process Equipment & Control Device(s))   | Installation Date/<br>Modification Date                        | Flexible Group ID |
|-------------------------------|--|--|-------------------|
| EUTOPCOATSYSTEM               | A topcoat spray booth followed by a curing oven. There is a heated flash-off area located between the basecoat portion of the booth and the clearcoat portion of the booth. The waterborne basecoat is applied manually or automatically with air atomized or electrostatic spray guns, the solventborne basecoat replacement (BCR) is applied manually or automatically with air atomized or electrostatic spray guns. The BCR is a topcoat material, but is applied in the primer surfacer booth. The solventborne clearcoat is applied manually or automatically with air atomized or electrostatic spray guns. The topcoat booth is equipped with a downdraft water wash system to control particulate emissions from paint overspray. VOC emissions from the curing ovens are controlled by a thermal oxidizer. | 5/19/1981<br>11/15/1982<br>1/17/1989<br>7/18/1991<br>6/24/1993 | NA                |
| EUDEADNER                     | A spraybooth equipped with a particulate control system in which a waterborne deadener material will be applied using an atomized (or other equivalent technology) applicator.   | 5/19/1981<br>11/15/1982<br>1/17/1989                           | NA                |
| EUFINALREPAIR                 | A combination final repair down draft booth with a particulate control system and dry filter stalls located throughout the assembly plant. The booth and stalls are equipped with automatic and manual applicators.  | 5/19/1981<br>11/15/1982<br>1/17/1989                           | NA                |
| EUSEALERADH                   | Various sealers, adhesives, and fillers are applied in the body shop, the paint shop and the general assembly areas.   | 5/19/1981<br>11/15/1982<br>1/17/1989<br>12/11/1989             | NA                |
| EUBOOTHCLEAN                  | The application of solvents to clean spray booths. There are no add-on controls for this emission unit.  | 5/19/1981<br>11/15/1982<br>1/17/1989<br>12/11/1989             | NA                |
| EUPURGE                       | This operation is the purging of applicators within the paint spray booth.   | 5/19/1981<br>11/15/1982<br>1/17/1989<br>12/11/1989             | NA                |
| EUMISCSOLV                    | These activities consist of miscellaneous cleaning activities, bodywipe, general assembly clean-up, production equipment clean-up and maintenance equipment clean-up.  | 5/19/1981<br>11/15/1982<br>1/17/1989<br>12/11/1989             | NA                |
| EU-Acoustical/Structural Foam | A two-part polyurethane foam system that will be injected into the hollow areas of the vehicle.  | 7/28/04  | FG-MACT           |

| Emission Unit ID  | Emission Unit Description<br>(Including Process Equipment & Control Device(s))  | Installation Date/<br>Modification Date            | Flexible Group ID |
|---|---|--|-------------------|
| Gasoline fuel filling operations and all gasoline storage tanks containing fuel for vehicle fuel filling operations | All gasoline storage tanks containing fuel for vehicle fuel filling operations. Vehicles being filled with gasoline shall be equipped with on-board refueling vapor recovery (ORVR), Stage II oxidizer, or other equivalent vapor control system. | 5/19/1981<br>11/15/1982<br>1/17/1989<br>12/11/1989 | FGFUELFILL        |
| Each Rule 285(i) and Rule 285(l)(vi) exempt equipment   | Each grinding and welding operation exempt from Rule 201 pursuant to Rule 285(i) or Rule 285(l)(vi).  | NA   | FGWELDGRIND       |
| Each cold cleaner   | Each cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv).   | NA   | FGCOLDCLEANERS    |
| Each Rule 284 exempt existing or new storage tank   | Any existing (placed into operation before 7/1/79), new (placed into operation on or after 7/1/79) or modified storage tank that is exempt from the requirements of Rule 201 pursuant to Rule 284.  | NA   | FGTANKS           |
| Each Rule 287(c) exempt surface coating line  | Each emission unit exempt from Rule 201 pursuant to Rule 287(c).  | NA   | FGRULE287(c)      |
| Each Rule 290 emission unit   | Each emission unit exempt from Rule 201 pursuant to Rule 290.   | NA   | FGRULE290         |

|  |
|--|
| <b>EUPRETREATMENT<br/>EMISSION UNIT CONDITIONS</b> |
|--|

**DESCRIPTION**

Surface preparation for the painting applications to follow. Vehicle bodies are cleaned with detergent and rinsed. Microcrystals are applied to vehicle bodies for corrosion resistance and enhanced paint adhesion. There are not any add-on controls associated with this emission unit.

Flexible Grouping ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

NA

See Appendix 1.5

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. Permittee shall maintain a current listing from the manufacturer of the chemical composition of each material used in EUPRETREATMENT, including the weight percent of each compound. The data may consist of MSDSs, manufacturer's formulation data, or both. (R°336.1213(3))

See Appendix 1.3, 1.4, and/or 1.7

**VII. REPORTING**

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

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

**See Appendix 1.8**

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

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

| <b>Stack &amp; Vent ID</b>     | <b>Maximum Exhaust Dimensions (inches)</b> | <b>Minimum Height Above Ground (feet)</b> | <b>Underlying Applicable Requirements</b> |
|--------------------------------|--|---|---|
| 1. SV003 (Oleum Phosphate 35A) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |
| 2. SV004 (Oleum Phosphate 35B) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |
| 3. SV005 (Oleum Phosphate 35C) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |
| 4. SV006 (Oleum Phosphate 35D) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |
| 5. SV007 (Oleum Phosphate 35E) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |
| 6. SV008 (Oleum Phosphate 35F) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |
| 7. SV009 (Oleum Phosphate 35G) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |
| 8. SV010 (Oleum Phosphate 35H) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |
| 9. SV011 (Oleum Phosphate 35I) | NA   | 53 <sup>2</sup>                           | R*336.1220(1)(d)                          |

**IX. OTHER REQUIREMENT(S)**

NA

**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).

***EUELPOSYSTEM***  
**EMISSION UNIT CONDITIONS**

**DESCRIPTION**

An electrocoat dip tank followed by an electrocoat curing oven. There are not any add on controls associated with this emission unit.

Flexible Grouping ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

| Pollutant | Limit   | Time Period/ Operating Scenario  | Equipment    | Monitoring/ Testing Method       | Underlying Applicable Requirements                          |
|-----------|---|--|--------------|----------------------------------|---|
| 1. VOC    | 76.8 pph <sup>2</sup>   | Averaged over the operating hours in a calendar month, with the exception of testing pursuant to General Condition (GC) 13, when it shall be determined by the testing protocol agreed upon by AQD | EUELPOSYSTEM | GC 13, SCs V.1, VI.1, VI.2, VI.3 | <b>R°336.1220</b>   |
| 2. VOC    | 0.16 kilograms per liter of applied coating solids <sup>2</sup> | Calendar month volume weighted average   | EUELPOSYSTEM | SCs VI.3, IX.1                   | <b>R°336.1220, 40 CFR 60.392(a)(1)(i), 40 CFR 60.393(c)</b> |
| 3. VOC    | 1.2 pounds per gallon coating, minus water, as applied          | Calendar month volume weighted average   | EUELPOSYSTEM | SCs V.1, VI.1, VI.3              | <b>R°336.1702(d)</b>  |
| 4. VOC    | 172.8 tpy <sup>2</sup>  | As determined at the end of each calendar year   | EUELPOSYSTEM | SCs V.1, VI.1, VI.3              | <b>R°336.1220</b>   |

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. The VOC content for each primer, minus water, as applied, shall be determined using EPA Reference Method 24. Alternatively, for water-borne primer, the VOC content may be determined from formulation data, and for non-water-borne primer, the VOC content may be determined from formulation data if acceptable to the AQD District Supervisor. If the Method 24 and formulation values should differ, then Method 24 results shall be used to determine compliance. Records of the VOC content shall be maintained.<sup>2</sup> **(R°336.1213(3), R°336.1702(d))**

**See Appendix 1.5**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. **(R°336.1213(3)(b)(ii))**

1. The permittee shall record the material and coating usage for EUELPOSYSTEM: monthly record.<sup>2</sup> **(R°336.1213(3))**
2. The permittee shall record the production hours for EUELPOSYSTEM: monthly record.<sup>2</sup> **(R°336.1213(3))**
3. The permittee shall calculate and maintain records of the VOC emission rate in pounds per hour, tons per calendar year, pounds per gallon of applied coating solids, as applied: monthly record, and pounds of VOC per gallon (minus water), as applied: monthly record.<sup>2</sup> **(R°336.1213(3), R°336.1702(d), 40 CFR 60.395(b))**

**See Appendix 1.7**

**VII. REPORTING**

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

**See Appendix 1.8**

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

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

| <b>Stack &amp; Vent ID</b>  | <b>Maximum Exhaust Dimensions (inches)</b> | <b>Minimum Height Above Ground (feet)</b> | <b>Underlying Applicable Requirements</b>       |
|-----------------------------|--|---|---|
| 1. SV001 (Dip Tank 33A)     | NA   | 53 <sup>2</sup>                           | <b>R°336.1220(1)(d), R°336.1901</b>             |
| 2. SV002 (Dip Tank 33B)     | NA   | 53 <sup>2</sup>                           | <b>R°336.1220(1)(d), R°336.1901</b>             |
| 3. SV012 (Oven Zone 1; 34A) | NA   | 53 <sup>2</sup>                           | <b>40 CFR 52.21(c) and (d), R336.1220(1)(d)</b> |
| 4. SV013 (Oven Zone 2; 34B) | NA   | 53 <sup>2</sup>                           | <b>40 CFR 52.21(c) and (d), R336.1220(1)(d)</b> |
| 5. SV014 (Oven Zone 3; 34C) | NA   | 53 <sup>2</sup>                           | <b>40 CFR 52.21(c) and (d), R336.1220(1)(d)</b> |
| 6. SV015 (Oven Zone 4; 34D) | NA   | 53 <sup>2</sup>                           | <b>40 CFR 52.21(c) and (d), R336.1220(1)(d)</b> |

| Stack & Vent ID              | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements       |
|------------------------------|-------------------------------------|------------------------------------|--|
| 7. SV016 (Oven Zone 5; 34E)  | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d), R336.1220(1)(d) |
| 8. SV017 (Oven Erncool 34F)  | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d), R336.1220(1)(d) |
| 9. SV018 (Oven Zone 6; 34G)  | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d), R336.1220(1)(d) |
| 10. SV019 (Oven Zone 7; 34H) | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d), R336.1220(1)(d) |
| 11. SV020 (Oven Zone 8; 34I) | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d), R336.1220(1)(d) |
| 12. SV021 (Cooling 34K)      | NA                                  | 53 <sup>2</sup>                    | R <sup>3</sup> 336.1220(1)(d)            |
| 13. SV022 (Cooling 34L)      | NA                                  | 53 <sup>2</sup>                    | R <sup>3</sup> 336.1220(1)(d)            |
| 14. SV023 (Cooling 34M)      | NA                                  | 53 <sup>2</sup>                    | R <sup>3</sup> 336.1220(1)(d)            |

**IX. OTHER REQUIREMENT(S)**

- The permittee shall comply with the Standards of Performance for New Stationary Sources (40 CFR Part 60) General Provisions (Subpart A) and Standards of Performance for Automobile and Light-Duty Truck Surface Coating Operations (Subpart MM).<sup>2</sup> **(40 CFR Part 60, Subparts A and MM)**

**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).

**EUPRIMERSURFACER  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A guidecoat (primer surfacer) spray booth followed by a curing oven. The solventborne primersurfacer is applied manually or automatically with air atomized or electrostatic spray guns. The guidecoat booth is equipped with a downdraft water wash system to control particulate emissions from paint overspray. VOC emissions from the curing oven are controlled by a thermal oxidizer.

**Flexible Grouping ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Thermal incineration, downdraft water wash system.

**I. EMISSION LIMIT(S)**

| Pollutant | Limit   | Time Period/<br>Operating Scenario   | Equipment        | Monitoring/<br>Testing<br>Method  | Underlying<br>Applicable<br>Requirements             |
|-----------|---|--|------------------|---|--|
| 1. PM     | 2.42 pph <sup>2</sup>   | Averaged over the operating hours in a calendar month, with the exception of testing pursuant to General Condition (GC) 13, when it shall be determined by the testing protocol agreed upon by AQD | EUPRIMERSURFACER | GC 13, SCs III.1, VI.9, VI.11   | R°336.1220   |
| 2. PM     | 5.45 tpy <sup>2</sup>   | As determined at the end of each calendar year   | EUPRIMERSURFACER | SCs III.1, VI.9, VI.12  | R°336.1220   |
| 3. VOC    | 109 pph <sup>2</sup>  | Averaged over the operating hours in a calendar month, with the exception of testing pursuant to General Condition (GC) 13, when it shall be determined by the testing protocol agreed upon by AQD | EUPRIMERSURFACER | GC 13, SCs III.2, IV.1, V.1, V.2, V.3, V.4, VI.1, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10 | R°336.1220   |
| 4. VOC    | 1.40 kilograms per liter of applied coating solids <sup>2</sup> | Calendar month volume weighted average   | EUPRIMERSURFACER | SCs VI.1, VI.3, VI.4, VI.5, VI.6, IX.1  | R°336.1220,<br>40 CFR 60.392(b),<br>40 CFR 60.393(c) |
| 5. VOC    | 14.9 pounds per gallon of applied coating solids                | Calendar day volume weighted average as determined by the procedure specified in R°336.1610(6)(b)  | EUPRIMERSURFACER | SCs III.2, IV.1, V.1, V.2, V.3, V.4, VI.1, VI.2, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10  | R°336.1702(d)  |

| Pollutant | Limit                 | Time Period/<br>Operating Scenario  | Equipment                                     | Monitoring/<br>Testing<br>Method  | Underlying<br>Applicable<br>Requirements |
|-----------|-----------------------|---|---|---|--|
| 6. VOC    | 245 tpy <sup>2</sup>  | As determined on a 12 month rolling total at the end of each calendar month | EUPRIMERSURFACER                              | SCs III.2, IV.1, V.1, V.2, V.3, V.4, VI.1, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10  | R°336.1220                               |
| 7. VOC    | 12.6 pph <sup>2</sup> | Averaged over the operating hours in a calendar month                       | Anti-Chip Application within EUPRIMERSURFACER | SCs III.2, IV.1, V.1, V.2, V.3, V.4, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10, VI.13 | R°336.1201(3)                            |
| 8. VOC    | 28.5 tpy <sup>2</sup> | As determined on a 12 month rolling total at the end of each calendar month | Anti-Chip Application within EUPRIMERSURFACER | SCs III.2, IV.1, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10, VI.14                     | R°336.1201(3)                            |

**II. MATERIAL LIMIT(S)**

NA

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

1. Permittee shall not operate a spray booth of EUPRIMERSURFACER, including the anti-chip application, unless the spray booth's associated downdraft water wash system control equipment is installed and operating properly.<sup>2</sup> (R°336.1220, R°336.1910)
2. Permittee shall not operate EUPRIMERSURFACER, including the anti-chip application, unless the associated oven incinerators servicing EUPRIMERSURFACER are installed and operating properly. Proper operation includes maintaining a minimum temperature of 1300°F in each oven incinerator. In lieu of a minimum temperature, an average temperature of 1300°F based upon a three average may be used.<sup>2</sup> (R°336.1220, R°336.1910, 64.6(c)(1)(i),(ii))

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

1. Permittee shall not operate EUPRIMERSURFACER, including the anti-chip application, unless a minimum retention time of 0.5 seconds is maintained in each oven incinerator servicing EUPRIMERSURFACER.<sup>2</sup> (R°336.1220, R°336.1910, 64.6(c)(1)(i),(ii))

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. The Permittee shall verify the transfer efficiency rates of EUPRIMERSURFACER by testing, at owner's expense, according to the following schedule:
  - a. Within 180 days of issuance of this permit if an acceptable transfer efficiency test has not been conducted within 5 years prior to the issuance of the ROP, unless the Permittee has submitted an acceptable demonstration that the most recent test remains valid and representative. (R°336.1213(3), R°336.1702(d))
  - b. Within 180 days of making any changes in operating conditions which necessitate the reevaluation of the transfer efficiency, as required by the EPA Protocol. (R°336.1213(3), R°336.1702(d))

Verification of transfer efficiency rates includes the submittal of a complete report of the test results. No less than 30 days prior to testing, a complete testing plan must be submitted to the DEQ-AQD. The final plan must be approved by the DEQ-AQD prior to testing. No less than 7 days before any tests are conducted, the Permittee shall notify the DEQ-AQD District Supervisor, in writing, of the time and place of the test and who will be conducting it. The testing shall conform to the EPA Protocol. **(R°336.1213(3), R°336.2001(3))**

2. The Permittee shall verify the oven exhaust control device VOC loading rates of EUPRIMERSURFACER, by testing, at owner's expense, according to the following schedule:
  - a. Within 180 days of issuance of this permit if an acceptable oven exhaust control device VOC loading test has not been conducted within 5 years prior to the issuance of the ROP, unless the Permittee has submitted an acceptable demonstration that the most recent acceptable tests remain valid and representative. **(R°336.1213(3), R°336.1702(d))**
  - b. Within 180 days of making any changes in operating conditions which necessitate the reevaluation of the oven exhaust control device VOC loading rates. **(R°336.1213(3), R°336.1702(d))**

Verification of oven exhaust control device VOC loading rates oven includes the submittal of a complete report of the test results. No less than 30 days prior to testing, a complete testing plan must be submitted to the DEQ-AQD. The final plan must be approved by the DEQ-AQD prior to testing. No less than 7 days before any tests are conducted, the Permittee shall notify the DEQ-AQD District Supervisor, in writing, of the time and place of the test and who will be conducting it. The testing shall conform to the EPA Protocol. **(R°336.1213(3), R°336.2001(3))**

3. The Permittee shall verify the oven exhaust control device destruction efficiency of EUPRIMERSURFACER, by testing, at owner's expense, according to the following schedule:
  - a. Within 180 days of issuance of this permit if an acceptable oven exhaust control device destruction efficiency test has not been conducted within 5 years prior to the issuance of the ROP, unless the Permittee has submitted an acceptable demonstration that the most recent acceptable tests remain valid and representative. **(R°336.1213(3), R°336.1702(d))**
  - b. Within 180 days of making any changes in operating conditions which necessitate the reevaluation of the oven exhaust device destruction efficiency. **(R°336.1213(3), R°336.1702(d))**

Verification of oven exhaust control device destruction efficiency includes the submittal of a complete report of the test results. No less than 30 days prior to testing, a complete testing plan must be submitted to the DEQ-AQD. The final plan must be approved by the DEQ-AQD prior to testing. No less than 7 days before any tests are conducted, the Permittee shall notify the DEQ-AQD District Supervisor, in writing, of the time and place of the test and who will be conducting it. The testing shall conform to the EPA Protocol. **(R°336.1213(3), R°336.2001(3))**

4. For EUPRIMERSURFACER, the Permittee shall determine the VOC content of any coating or material as applied or as received using federal Reference Method 24 and formulation data as specified in the EPA Protocol. The verification of the analytical VOC content, as received, by testing, at owner's expense, will be required for each non-waterborne coating or material at least once during each calendar year. Alternatively, the Permittee may elect to have the Method 24 analysis performed by the coating or material supplier on each batch of coating.<sup>2</sup> **((R°336.1213(3), R°336.1702(d))**

**See Appendix 1.5**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. **(R°336.1213(3)(b)(ii))**

1. The permittee shall record the following production, usage, coating composition, and emission calculation records for the EUPRIMERSURFACER:<sup>2</sup> **(R°336.1213(3), R°336.1702(d), 40 CFR 60.395(b))**

- a. The daily, monthly, and yearly number of jobs produced.
  - b. The production hours per calendar month.
  - c. The monthly usage rate of each coating.
  - d. The pounds of VOC per gallon, as applied, for each coating.
  - e. The solids volume fraction of each coating.
  - f. The calculated monthly VOC emission rate in pounds per hour, tons per month as determined at the end of each calendar month, tons per calendar year as determined at the end of each month, pounds per gallon of applied coating solids for each production day as determined by the EPA Protocol, and kilograms per liter of applied coating solids as determined by 40 CFR 60.393. (Please see Appendix 1.7).
2. The permittee shall maintain records of the following data, test documentation, and annual reviews which are necessary to perform the calculations in the publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-duty Truck Topcoat Operations", EPA-450/3-88-018, or as amended (The EPA Protocol):<sup>2</sup> **(R°336.1213(3), R°336.1702(d))**
- a. For each type of coating used during the calendar month:
    - i. Coating identification.
    - ii. Analytical VOC content as determined by EPA Reference Test Method 24.
    - iii. Formulation VOC and volume solids content.
    - iv. Coating usage, including withdrawals.
    - v. Reducer solvent usage and density.
  - b. Number of vehicles coated per production day by body style, coating color, and square footage coated (or equivalent unit), unless daily coating records are kept.
  - c. Transfer efficiency
    - i. Value(s) used in EPA Protocol calculations.
    - ii. Value(s) from most recent test.
    - iii. Annual review of operating conditions to demonstrate that the transfer efficiency remains valid.
  - d. Oven exhaust control device VOC loading (booth/oven split).
    - i. Value(s) used in EPA Protocol calculations.
    - ii. Value(s) from most recent test.
    - iii. Annual review of operating conditions to demonstrate that the oven exhaust control device VOC loading remains valid.
  - e. Destruction efficiency of each control device.
    - i. Value(s) used in protocol calculations.
    - ii. Value(s) derived from most recent test.
3. The permittee shall equip each thermal oxidizer servicing EUPRIMERSURFACER with a temperature measurement device, installed in the firebox, which has an accuracy of the greater of  $\pm 0.75\%$  of the temperature being measured, expressed in degrees Celsius or  $\pm 2.5^\circ\text{C}$ . Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. Additionally, each temperature measurement device shall be equipped with a recording device so that a permanent record is produced.<sup>2</sup> **(R°336.1213(3), 40 CFR 60.394, 64.6(c)(1)(i),(ii))**
4. When EUPRIMERSURFACER is in operation, the permittee shall monitor and record the temperature in the thermal oxidizers on a continuous basis and in a manner with instrumentation acceptable to the Air Quality

Division. Continuous recording is defined as at least one record every 15 minutes.<sup>2</sup> **(R°336.1213(3) 40 CFR 60.395(c), 64.6(c)(1)(i),(ii))**

5. The permittee shall generate a monthly summary of thermal oxidizer temperature data. This summary shall include statements indicating the operational status of EUPRIMERSURFACER (in operation, not in operation), the date, time, and duration of all periods during which the thermal oxidizer did not operate properly, and whether or not production continued during those periods. The summary shall also describe malfunction abatement procedures, corrective actions taken, and preventive measures enacted to prevent future downtime. **(R°336.1213(3), R°336.1910, 40 CFR 60.395(c), 64.6(c)(1)(i),(ii))**
6. The permittee shall maintain records documenting the calibration or accuracy validation of each thermal oxidizer temperature measurement device. **(R°336.1213(3), 64.6(c)(1)(i),(ii))**
7. The permittee shall conduct an annual inspection of each thermal oxidizer and associated equipment. Records documenting the annual inspection and all preventive maintenance activities shall be maintained. **(R°336.1213(3), R°336.1910, 64.6(c)(1)(i),(ii))**
8. For each thermal incinerator servicing EUPRIMERSURFACER, the Permittee shall maintain a demonstration that the minimum gas retention time of 0.5 seconds is obtained for each thermal incinerator. If such a demonstration cannot be shown through engineering calculations of maximum possible gas flow, based on the size of the ductwork, the size of the firebox, and the size of the fan, or some alternative method acceptable to the AQD, then the Permittee shall provide monitoring, acceptable to the AQD, for the thermal incinerators which will allow for the assurance that the 0.5 second retention time is maintained. **(R°336.1213(3), 64.6(c)(1)(i),(ii))**
9. The permittee shall monitor the condition of the downdraft water wash particulate control system through the use of alarms on water feed pumps or by daily visual inspection. Records of the date and time of alarm events and daily visual inspections shall be maintained. Additionally, records of the date and scope of any preventive or corrective maintenance conducted shall be maintained. If the alarm system option is selected, the permittee shall, at a minimum, conduct weekly visual inspections of the water wash system and document the observations. **(R°336.1213(3), R°336.1910)**
10. The permittee shall maintain a current written description of the paint system (i.e., all process and control equipment), including the date and description of any changes or replacements made. The records shall be kept to assist the determination of the effects of such changes to VOC loading, incinerator destruction efficiency, and transfer efficiency during the compliance evaluation. **(R°336.1213(3), 64.6(c)(1)(i),(ii))**
11. Permittee shall maintain on record a calculation of the PM emission rate from EUPRIMERSURFACER in pounds per hour, averaged on a calendar monthly basis at the end of each calendar month, and based on the hours of operation over the calendar month. Permittee shall record all values necessary to calculate these emission rates and the derivation of the necessary values. The calculation shall be based on emission factors obtained from the most recent test data obtained from EUPRIMERSURFACER, or in the event such data is not available, based on engineering calculations acceptable to the AQD. **(R°336.1213(3)(a)(ii))**.
12. Permittee shall calculate and record of the PM emission rate from EUPRIMERSURFACER, on a tons per year basis as determined at the end of each calendar year. The calculation shall be based on emission factors obtained from the most recent test data obtained from EUPRIMERSURFACER, or in the event such data is not available, based on engineering calculations acceptable to the AQD. **(R°336.1213(3)(a)(ii))**.
13. Permittee shall calculate and record the VOC emission rate from the anti-chip application within in pounds per hour, averaged on a calendar monthly basis at the end of each calendar month, and based on the hours of operation over the calendar month. Permittee shall record all values necessary to calculate these emission rates and the derivation of the necessary values. These values include, but are not limited to, the calendar monthly rate of all materials used in anti-chip application and the calendar monthly hours of the anti-chip application.<sup>2</sup> **(R°336.1213(3))**
14. Permittee shall calculate and record the VOC emission rate from the anti-chip application within EUPRIMERSURFACER in tons per month as determined at the end of each calendar month and in tons per

year as determined at the end of each calendar year. Permittee shall record all values necessary to calculate these emission rates and the derivation of the necessary values.<sup>2</sup> **(R°336.1213(3))**

15. For each control device in operation during production (coating vehicles, booth cleaning, etc.) and if the equipment is equipped with a bypass line, the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass was open shall be kept on file. **(64.3(a)(2))**
16. The permittee keep records of maintenance inspections which include the dates, results of inspections and the dates and reasons for repairs if made for the thermal oxidizers. The permittee shall also perform a heat exchanger visual internal inspection a minimum of once every 18 months. **(64.6(c)(1)(i),(ii), 64.7(e))**

See Appendix 1.7

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there were no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

See Appendix 1.8

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

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

| <b>Stack &amp; Vent ID</b>                               | <b>Maximum Exhaust Dimensions (inches)</b> | <b>Minimum Height Above Ground (feet)</b> | <b>Underlying Applicable Requirements</b> |
|--|--|---|---|
| 1. SV24<br>(Primer Surfacer Mod. 1-16/Topcoat Mod. 1-10) | NA   | 147 <sup>2</sup>                          | R°336.1201(3)                             |
| 2. SV25 (Oven 30A)                                       | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 3. SV26 (Oven 30B)                                       | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 4. SV27 (Oven 30C)                                       | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 5. SV28 (Oven 30D)                                       | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 6. SV29 (Wet Sand Oven 32A)                              | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 7. SV30 (Wet Sand Oven 32B)                              | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 8. SV31 (Wet Sand Oven 32C)                              | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 9. SV32 (Wet Sand Oven 32D)                              | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 10. SV33 (Wet Sand Oven 32E)                             | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 11. SV34 (Wet Sand Oven 32F)                             | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |
| 12. SV35 (Wet Sand Oven 32G)                             | NA   | 53 <sup>2</sup>                           | 40 CFR 52.21(c) and (d)                   |

| Stack & Vent ID              | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|------------------------------|-------------------------------------|------------------------------------|------------------------------------|
| 13. SV36 (Wet Sand Oven 32H) | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with the Standards of Performance for New Stationary Sources (40 CFR Part 60) General Provisions (Subpart A) and Standards of Performance for Automobile and Light-Duty Truck Surface Coating Operations (Subpart MM).<sup>2</sup> **(40 CFR Part 60, Subparts A and MM)**
2. For the purposes of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(64.6(c)(2))**
  - a. temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special conditions III.2.
  - b. A monitoring excursion is defined as a failure to properly monitor as required in special conditions VI.4 or VI.15
  - c. An Monitoring excursion is defined as a failure to properly implement and/or maintain the O&M plan required in special condition VI.3 and VI.16.
3. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

**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).

**EUTOPCOATSYSTEM  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A topcoat spray booth followed by a curing oven. There is a heated flash-off area located between the basecoat portion of the booth and the clearcoat portion of the booth. The waterborne basecoat is applied manually or automatically with air atomized or electrostatic spray guns, the solventborne basecoat replacement (BCR) is applied manually or automatically with air atomized or electrostatic spray guns. The BCR is a topcoat material, but is applied in the primer surfacer booth. The solventborne clearcoat is applied manually or automatically with air atomized or electrostatic spray guns. The topcoat booth is equipped with a downdraft water wash system to control particulate emissions from paint overspray. VOC emissions from the curing ovens are controlled by a thermal oxidizer.

**Flexible Grouping ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Downdraft water wash system, thermal incineration, purge collection for solventborne material.

**I. EMISSION LIMIT(S)**

| Pollutant | Limit   | Time Period/<br>Operating Scenario   | Equipment       | Monitoring/<br>Testing<br>Method   | Underlying<br>Applicable<br>Requirements                      |
|-----------|---|--|-----------------|--|---|
| 1. PM     | 11.3 pph  | Averaged over the operating hours in a calendar month, with the exception of testing pursuant to General Condition (GC) 13, when it shall be determined by the testing protocol agreed upon by AQD | EUTOPCOATSYSTEM | GC 13, SCs III.1, VI.9, VI.11  | <b>R°336.1220</b>   |
| 2. PM     | 26.6 tpy  | As determined at the end of each calendar year   | EUTOPCOATSYSTEM | SCs III.1, VI.9, VI.12   | <b>R°336.1220</b>   |
| 3. VOC    | 367 pph <sup>2</sup>  | Averaged over the operating hours in a calendar month, with the exception of testing pursuant to General Condition (GC) 13, when it shall be determined by the testing protocol agreed upon by AQD | EUTOPCOATSYSTEM | GC 13, SCs III.2, IV.1, IV.1, V.1, V.2, V.3, V.4, V.5, VI.1, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10 | <b>R°336.1220</b>   |
| 4. VOC    | 1.47 kilograms per liter of applied coating solids <sup>2</sup> | Calendar month volume weighted average   | EUTOPCOATSYSTEM | SCs VI.1, VI.3, VI.4, VI.5, VI.6, IX.1   | <b>R°336.1220,<br/>40 CFR 60.392(c),<br/>40 CFR 60.393(c)</b> |

| Pollutant | Limit  | Time Period/<br>Operating Scenario  | Equipment       | Monitoring/<br>Testing<br>Method  | Underlying<br>Applicable<br>Requirements |
|-----------|--|---|-----------------|---|--|
| 5. VOC    | 14.9 pounds per gallon of applied coating solids | Calendar day volume weighted average as determined by the procedure specified in R°336.1610(6)(b) | EUTOPCOATSYSTEM | SCs III.2, IV.1, IV.1, V.1, V.2, V.3, V.4, V.5, VI.1, VI.2, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10 | R°336.1702(d)                            |
| 6. VOC    | 796 tpy <sup>2</sup>                             | As determined on a 12 month rolling total at the end of each calendar month                       | EUTOPCOATSYSTEM | SCs III.2, III.3, IV.1, V.1, V.2, V.3, V.4, V.5, VI.1, VI.3, VI.4, VI.5, VI.6, VI.7, VI.8, VI.10      | R°336.1220                               |

**II. MATERIAL LIMIT(S)**

NA

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

1. Permittee shall not operate a spray booth of EUTOPCOATSYSTEM unless the spray booth’s associated downdraft water wash system control equipment is installed and operating properly.<sup>2</sup> (R°336.1220, R°336.1910)
2. Permittee shall not operate EUTOPCOATSYSTEM unless the associated oven incinerators servicing EUTOPCOATSYSTEM are installed and operating properly. Proper operation includes maintaining a minimum temperature of 1300°F in each oven incinerator and maintaining a VOC destruction efficiency of not less than 90% in each oven incinerator. In lieu of a minimum temperature, an average temperature of 1300°F based upon a three hour average may be used.<sup>2</sup> (R°336.1220, R°336.1910, 64.6(c)(1)(i),(ii))
3. Permittee shall not operate EUTOPCOATSYSTEM unless the purge capture system for solventborne materials is installed and operating properly and providing a VOC capture efficiency of 85 percent.<sup>2</sup> (R°336.1220, R°336.1910)

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

1. Permittee shall not operate EUTOPCOATSYSTEM unless a minimum retention time of 0.5 seconds is maintained in each oven incinerator servicing EUTOPCOATSYSTEM.<sup>2</sup> (R°336.1220, R°336.1910, 64.6(c)(1)(i),(ii))

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. The Permittee shall verify the transfer efficiency rates of EUTOPCOATSYSTEM by testing, at owner’s expense, according to the following schedule:
  - a. Within 180 days of issuance of this permit if an acceptable transfer efficiency test has not been conducted within 5 years prior to the issuance of the ROP, unless the Permittee has submitted an acceptable demonstration that the most recent test remains valid and representative. (R°336.1213(3), R°336.1702(d))

- b. Within 180 days of making any changes in operating conditions which necessitate the reevaluation of the transfer efficiency, as required by the EPA Protocol. **(R°336.1213(3), R°336.1702(d))**

Verification of transfer efficiency rates includes the submittal of a complete report of the test results. No less than 30 days prior to testing, a complete testing plan must be submitted to the DEQ-AQD. The final plan must be approved by the DEQ-AQD prior to testing. No less than 7 days before any tests are conducted, the Permittee shall notify the DEQ-AQD District Supervisor, in writing, of the time and place of the test and who will be conducting it. The testing shall conform to the EPA Protocol. **(R°336.1213(3), R°336.2001(3))**

2. The Permittee shall verify the oven exhaust control device VOC loading rates of EUTOPCOATSYSTEM, by testing, at owner's expense, according to the following schedule:

a. Within 180 days of issuance of this permit if an acceptable oven exhaust control device VOC loading test has not been conducted within 5 years prior to the issuance of the ROP, unless the Permittee has submitted an acceptable demonstration that the most recent acceptable tests remain valid and representative. **(R°336.1213(3), R°336.1702(d))**

b. Within 180 days of making any changes in operating conditions which necessitate the reevaluation of the oven exhaust control device VOC loading rates. **(R°336.1213(3), R°336.1702(d))**

Verification of oven exhaust control device VOC loading rates oven includes the submittal of a complete report of the test results. No less than 30 days prior to testing, a complete testing plan must be submitted to the DEQ-AQD. The final plan must be approved by the DEQ-AQD prior to testing. No less than 7 days before any tests are conducted, the Permittee shall notify the DEQ-AQD District Supervisor, in writing, of the time and place of the test and who will be conducting it. The testing shall conform to the EPA Protocol. **(R°336.1213(3), R°336.2001(3))**

3. The Permittee shall verify the oven exhaust control device destruction efficiency of EUTOPCOATSYSTEM, by testing, at owner's expense, according to the following schedule:

a. Within 180 days of issuance of this permit if an acceptable oven exhaust control device destruction efficiency test has not been conducted within 5 years prior to the issuance of the ROP, unless the Permittee has submitted an acceptable demonstration that the most recent acceptable tests remain valid and representative. **(R°336.1213(3), R°336.1702(d))**

b. Within 180 days of making any changes in operating conditions which necessitate the reevaluation of the oven exhaust device destruction efficiency. **(R°336.1213(3), R°336.1702(d))**

Verification of oven exhaust control device destruction efficiency includes the submittal of a complete report of the test results. No less than 30 days prior to testing, a complete testing plan must be submitted to the DEQ-AQD. The final plan must be approved by the DEQ-AQD prior to testing. No less than 7 days before any tests are conducted, the Permittee shall notify the DEQ-AQD District Supervisor, in writing, of the time and place of the test and who will be conducting it. The testing shall conform to the EPA Protocol. **(R°336.1213(3), R°336.2001(3))**

4. For EUTOPCOATSYSTEM, the Permittee shall determine the VOC content of any coating or material as applied or as received using federal Reference Method 24 and formulation data as specified in the EPA Protocol. The verification of the analytical VOC content, as received, by testing, at owner's expense, will be required for each non-waterborne coating or material at least once during each calendar year. Alternatively, the Permittee may elect to have the Method 24 analysis performed by the coating or material supplier on each batch of coating.<sup>2</sup> **(R°336.1213(3), R°336.1702(d))**

5. Permittee shall verify the VOC capture efficiency of the purge capture system for solventborne materials, by testing, at owner's expense, within 180 days of issuance of this permit unless the Permittee has submitted an acceptable demonstration that the most recent acceptable tests remain valid and representative. Verification of VOC capture efficiency of the purge capture system includes the submittal of a complete report of the test results. No less than 30 days prior to testing, a complete testing plan must be submitted to the DEQ-AQD. The

final plan must be approved by the DEQ-AQD prior to testing. No less than 7 days before any tests are conducted, the Permittee shall notify the DEQ-AQD District Supervisor, in writing, of the time and place of the test and who will be conducting it. **(R°336.1213(3), R°336.2001(3))**

See Appendix 1.5

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. **(R°336.1213(3)(b)(ii))**

1. The permittee shall record the following production, usage, coating composition, and emission calculation records for the EUTOPCOATSYSTEM:<sup>2</sup> **(R°336.1213(3), R°336.1702(d), 40 CFR 60.395(b))**
  - a. The daily, monthly, and yearly number of jobs produced.
  - b. The production hours per calendar month.
  - c. The monthly usage rate of each coating.
  - d. The pounds of VOC per gallon, as applied, for each coating.
  - e. The solids volume fraction of each coating.
  - f. The calculated monthly VOC emission rate in pounds per hour, tons per month as determined at the end of each calendar month, tons per calendar year as determined at the end of each month, pounds per gallon of applied coating solids for each production day as determined by the EPA Protocol, and kilograms per liter of applied coating solids as determined by 40 CFR 60.393. (Please see Appendix 1.7).
2. The permittee shall maintain records of the following data, test documentation, and annual reviews which are necessary to perform the calculations in the publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-duty Truck Topcoat Operations", EPA-450/3-88-018, or as amended (The EPA Protocol):<sup>2</sup> **(R°336.1213(3), R°336.1702(d))**
  - a. For each type of coating used during the calendar month:
    - i. Coating identification.
    - ii. Analytical VOC content as determined by EPA Reference Test Method 24.
    - iii. Formulation VOC and volume solids content.
    - iv. Coating usage, including withdrawals.
    - v. Reducer solvent usage and density.
  - b. Number of vehicles coated per production day by body style, coating color, and square footage coated (or equivalent unit), unless daily coating records are kept.
  - c. Transfer efficiency
    - i. Value(s) used in EPA Protocol calculations.
    - ii. Value(s) from most recent test.
    - iii. Annual review of operating conditions to demonstrate that the transfer efficiency remains valid.
  - d. Oven exhaust control device VOC loading (booth/oven split).
    - i. Value(s) used in EPA Protocol calculations.
    - ii. Value(s) from most recent test.
    - iii. Annual review of operating conditions to demonstrate that the oven exhaust control device VOC loading remains valid.
  - e. Destruction efficiency of each control device.
    - i. Value(s) used in protocol calculations.
    - ii. Value(s) derived from most recent test.

3. The permittee shall equip each thermal oxidizer servicing EUTOPCOATSYSTEM with a temperature measurement device, installed in the firebox, which has an accuracy of the greater of  $\pm 0.75\%$  of the temperature being measured, expressed in degrees Celsius or  $\pm 2.5^\circ\text{C}$ . Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. Additionally, each temperature measurement device shall be equipped with a recording device so that a permanent record is produced.<sup>2</sup> **(R°336.1213(3), 40 CFR 60.394, 64.6(c)(1)(i),(ii))**
4. When EUTOPCOATSYSTEM is in operation, the permittee shall monitor and record the temperature in the thermal oxidizers on a continuous basis and in a manner with instrumentation acceptable to the Air Quality Division. Continuous recording is defined as at least one record every 15 minutes.<sup>2</sup> **(R°336.1213(3) 40 CFR 60.395(c), 64.6(c)(1)(i),(ii))**
5. The permittee shall generate a monthly summary of thermal oxidizer temperature data. This summary shall include statements indicating the operational status of EUTOPCOATSYSTEM (in operation, not in operation), the date, time, and duration of all periods during which the thermal oxidizer did not operate properly, and whether or not production continued during those periods. The summary shall also describe malfunction abatement procedures, corrective actions taken, and preventive measures enacted to prevent future downtime. **(R°336.1213(3), R°336.1910, 40 CFR 60.395(c), 64.6(c)(1)(i),(ii))**
6. The permittee shall maintain records documenting the calibration of each thermal oxidizer temperature measurement device. **(R°336.1213(3), 64.6(c)(1)(i),(ii))**
7. The permittee shall conduct an annual inspection of each thermal oxidizer and associated equipment. Records documenting the annual inspection and all preventive maintenance activities shall be maintained. **(R°336.1213(3), R°336.1910, 64.6(c)(1)(i),(ii))**
8. For each thermal incinerator servicing EUTOPCOATSYSTEM, the Permittee shall maintain a demonstration that the minimum gas retention time of 0.5 seconds is obtained for each thermal incinerator. If such a demonstration cannot be shown through engineering calculations of maximum possible gas flow, based on the size of the ductwork, the size of the firebox, and the size of the fan, or some alternative method acceptable to the AQD, then the Permittee shall provide monitoring, acceptable to the AQD, for the thermal incinerators which will allow for the assurance that the 0.5 second retention time is maintained. **(R°336.1213(3), 64.6(c)(1)(i),(ii))**
9. The permittee shall monitor the condition of the downdraft water wash particulate control system through the use of alarms on water feed pumps or by daily visual inspection. Records of the date and time of alarm events and daily visual inspections shall be maintained. Additionally, records of the date and scope of any preventive or corrective maintenance conducted shall be maintained. If the alarm system option is selected, the permittee shall, at a minimum, conduct weekly visual inspections of the water wash system and document the observations. **(R°336.1213(3), R°336.1910)**
10. The permittee shall maintain a current written description of the paint system (i.e., all process and control equipment), including the date and description of any changes or replacements made. The records shall be kept to assist the determination of the effects of such changes to VOC loading, incinerator destruction efficiency, and transfer efficiency during the compliance evaluation. **(R°336.1213(3), 64.6(c)(1)(i),(ii))**
11. Permittee shall maintain on record a calculation of the PM emission rate from EUTOPCOATSYSTEM in pounds per hour, averaged on a calendar monthly basis at the end of each calendar month, and based on the hours of operation over the calendar month. Permittee shall record all values necessary to calculate these emission rates and the derivation of the necessary values. The calculation shall be based on emission factors obtained from the most recent test data obtained from EUTOPCOATSYSTEM, or in the event such data is not available, based on engineering calculations acceptable to the AQD. **(R°336.1213(3)(a)(ii))**.
12. Permittee shall calculate and record of the PM emission rate from EUTOPCOATSYSTEM, on a tons per year basis as determined at the end of each calendar year. The calculation shall be based on emission factors obtained from the most recent test data obtained from EUTOPCOATSYSTEM, or in the event such data is not available, based on engineering calculations acceptable to the AQD. **(R°336.1213(3)(a)(ii))**.

13. For each control device in operation during production (coating vehicles, booth cleaning, etc.) and if the equipment is equipped with a bypass line, the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass was open shall be kept on file. **(64.3(a)(2))**
14. The permittee keep records of maintenance inspections which include the dates, results of inspections and the dates and reasons for repairs if made for the thermal oxidizers. The permittee shall also perform a heat exchanger visual internal inspection a minimum of once every 18 months. **(64.6(c)(1)(i),(ii), 64.7(e))**

See Appendix 1.7

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there were no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

See Appendix 1.8

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

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

| Stack & Vent ID   | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|---|-------------------------------------|------------------------------------|------------------------------------|
| 1. SV024<br>(Primer Surfacer Mod. 1-16/Topcoat Mod. 1-10) | NA                                  | 147 <sup>2</sup>                   | R°336.1201(3)                      |
| 2. SV047 (Mod. Oven #1 (19A))                             | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 3. SV048 (Mod. Oven #1 (19B); Airseal)                    | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 4. SV049 (Mod. Oven #2 (20A))                             | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 5. SV050 (Mod. Oven #2 (20B); Airseal)                    | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 6. SV051 (Mod. Oven #3 (21A))                             | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 7. SV052 (Mod. Oven #3 (21B); Airseal)                    | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 8. SV053 (Mod. Oven #4 (22A))                             | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 9. SV054 (Mod. Oven #4 (22B); Airseal)                    | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 10. SV055 (Mod. Oven #5 (23A))                            | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 11. SV056 (Mod. Oven #5 (23B); Airseal)                   | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 12. SV057 (Mod. Oven #6 (24A))                            | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 13. SV058 (Mod. Oven #6 (24B); Airseal)                   | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 14. SV059 (Mod. Oven #7 (25A))                            | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |

| Stack & Vent ID                         | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|---|-------------------------------------|------------------------------------|------------------------------------|
| 15. SV060 (Mod. Oven #7 (25B); Airseal) | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 16. SV061 (Mod. Oven #8 (26A))          | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |
| 17. SV062 (Mod. Oven #8 (26B); Airseal) | NA                                  | 53 <sup>2</sup>                    | 40 CFR 52.21(c) and (d)            |

**IX. OTHER REQUIREMENT(S)**

1. For the purposes of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(64.6(c)(2))**
  - a. temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special conditions III.2.
  - b. A monitoring excursion is defined as a failure to properly monitor as required in special conditions VI.4 or VI.13
  - c. An Monitoring excursion is defined as a failure to properly implement and/or maintain the O&M plan required in special condition VI.3 and VI.14.
  
2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

**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).

**EUDEADNER  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A spraybooth equipped with a particulate control system in which a waterborne deadener material will be applied using an air atomized (or other equivalent technology) applicator.

**Flexible Grouping ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Dry filters or downdraft water wash particulate control system.

**I. EMISSION LIMIT(S)**

| Pollutant | Limit  | Time Period/<br>Operating Scenario   | Equipment | Monitoring/<br>Testing<br>Method       | Underlying<br>Applicable<br>Requirements |
|-----------|--|--|-----------|--|--|
| 1. VOC    | 19.4 pph <sup>2</sup>  | Averaged over the operating hours in a calendar month, with the exception of testing pursuant to General Condition (GC) 13, when it shall be determined by the testing protocol agreed upon by AQD | EUDEADNER | GC 13; SCs V.1, VI.1, VI.2, VI.3, VI.4 | R°336.1220                               |
| 2. VOC    | 4.3 pounds per gallon of coating, minus water, as applied for clear coatings   | Calendar day volume weighted average as determined by the procedure specified in R°336.1621  | EUDEADNER | SCs V.1, VI.2, VI.3, VI.4              | R°336.1702(d),<br>R°336.2040             |
| 3. VOC    | 3.5 pounds per gallon of coating, minus water, as applied for air-dried coatings   | Calendar day volume weighted average as determined by the procedure specified in R°336.1621  | EUDEADNER | SCs V.1, VI.2, VI.3, VI.4              | R°336.1702(d),<br>R°336.2040             |
| 4. VOC    | 3.5 pounds per gallon of coating, minus water, as applied for extreme performance coatings   | Calendar day volume weighted average as determined by the procedure specified in R°336.1621  | EUDEADNER | SCs V.1, VI.2, VI.3, VI.4              | R°336.1702(d),<br>R°336.2040             |
| 5. VOC    | 3.0 pounds per gallon of coating, minus water, as applied for coatings not defined as clear, air-dried, extreme performance, truck final repair, glass adhesion body primer, or steel pail and drum interior | Calendar day volume weighted average as determined by the procedure specified in R°336.1621  | EUDEADNER | SCs V.1, VI.2, VI.3, VI.4              | R°336.1702(d),<br>R°336.2040             |

| Pollutant | Limit               | Time Period/<br>Operating Scenario  | Equipment | Monitoring/<br>Testing<br>Method | Underlying<br>Applicable<br>Requirements |
|-----------|---------------------|---|-----------|----------------------------------|--|
| 6. VOC    | 44 tpy <sup>2</sup> | As determined on a 12 month rolling total at the end of each calendar month | EUDEADNER | SCs V.1, VI.1, VI.2, VI.3, VI.4  | R°336.1220                               |

**II. MATERIAL LIMIT(S)**

NA

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

1. Permittee shall not operate EUDEADNER unless the associated particulate collection system control equipment is installed and operating properly.<sup>2</sup> (R°336.1213(3), R°336.1220, R°336.1910)

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

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. The VOC content of each material used in EUDEADNER shall be determined using federal Test Method 24 at representative time(s) and temperature(s) used to cure the related coating or material in practice as provided by ASTM D2369-98, 1.4 and Note 3. Alternatively, for waterborne material, the VOC content may be determined from manufacturer’s formulation data and for non-waterborne material, the VOC content may be determined from formulation data upon written approval by the District Supervisor. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content of each material shall be verified by testing.<sup>2</sup> ((R°336.1213(3), R°336.1702(d))

See Appendix 1.5

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. Permittee shall monitor and record the production hours for EUDEADNER: monthly record.<sup>2</sup> (R°336.1213(3))
2. Permittee shall monitor and record the quantity of coating used in EUDEADNER: monthly records.<sup>2</sup> (R°336.702(d))
3. Permittee shall monitor and record the VOC content of each deadener in pounds per gallon, minus water and plus water, as applied for EUDEADNER.<sup>2</sup> (R°336.1213(3), R°336.702(d))
4. Permittee shall calculate and record the VOC emission rates in pounds per hour, tons per calendar year, and pounds per gallon of coating, minus water, according to the methods outlined in Appendix 1.7 or an alternate method approved by DEQ-AQD: monthly records are required for using all compliant materials, daily volume weighted average records are required if an individual coating exceeds the 4.8 lbs VOC/gallon minus water limit as applied.<sup>2</sup> (R°336.702(d))
5. Permittee shall maintain a record of inspection (weekly/) and maintenance to ensure proper operation of the particulate collection system control equipment. (R°336.1213(3), R°336.1910)

See Appendix 1.7

**VII. REPORTING**

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

See Appendix 1.8

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

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

| Stack & Vent ID | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|-----------------|-------------------------------------|------------------------------------|------------------------------------|
| 1. SV037 (27A)  | NA                                  | 53 <sup>2</sup>                    | R°336.1220                         |
| 2. SV038 (27B)  | NA                                  | 53 <sup>2</sup>                    | R°336.1220                         |

**IX. OTHER REQUIREMENT(S)**

NA

**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).

**EUFINALREPAIR  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A combination final repair down draft booth with a particulate control system and dry filter stalls located throughout the assembly plant. The booth and stalls are equipped with automatic and manual applicators.

Flexible Grouping ID: NA

**POLLUTION CONTROL EQUIPMENT**

Down draft waterwash, dry filters

**I. EMISSION LIMIT(S)**

| Pollutant | Limit   | Time Period/ Operating Scenario  | Equipment     | Monitoring/ Testing Method             | Underlying Applicable Requirements |
|-----------|---|--|---------------|--|------------------------------------|
| 1. VOC    | 3.1 pph <sup>2</sup>  | Averaged over the operating hours in a calendar month, with the exception of testing pursuant to General Condition (GC) 13, when it shall be determined by the testing protocol agreed upon by AQD | EUFINALREPAIR | GC 13; SCs V.1, VI.1, VI.2, VI.3, VI.4 | R°336.1220                         |
| 2. VOC    | 4.8 pounds per gallon coating, minus water, as applied <sup>2</sup> | Calendar day volume weighted average   | EUFINALREPAIR | SCs V.1, VI.2, VI.3, VI.4              | R°336.1702(d)                      |
| 3. VOC    | 6.8 tpy <sup>2</sup>  | As determined on a 12 month rolling total at the end of each calendar month  | EUFINALREPAIR | SCs V.1, VI.1, VI.2, VI.3, VI.4        | R°336.1220                         |

**II. MATERIAL LIMIT(S)**

NA

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

1. Permittee shall not operate a spray booth of EUFINALREPAIR unless the associated particulate collection system control equipment, either a down draft waterwash system or a dry filter system as applicable to the individual spray booth, is installed and operating properly.<sup>2</sup> (R°336.1213(3), R°336.1220, R°336.1910)

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

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. For EUFINALREPAIR, the VOC content, water content and density of any coating or material as applied and as received, shall be determined using federal Reference Method 24. Alternatively, for waterborne coatings and materials, the VOC content, water content and density may be determined from manufacturer's formulation data. Alternatively, for non-waterborne coatings and materials, the VOC content, water content, and density may be determined from manufacturer's formulation data upon written approval by the AQD District Supervisor. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content, and density of any coating or material shall be verified by testing using federal Reference Method 24.<sup>2</sup> **(R°336.1213(3), R°336.1702(d))**

See Appendix 1.5

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. **(R°336.1213(3)(b)(ii))**

1. Permittee shall monitor and record the production hours for EUFINALREPAIR: monthly record.<sup>2</sup> **(R°336.1213(3))**
2. Permittee shall monitor and record the quantity of coating and reducer (solvent) used in EUFINALREPAIR: monthly records.<sup>2</sup> **(R°336.702(d))**
3. Permittee shall monitor and record the VOC content (pounds per gallon) and water content for all coatings used in EUFINALREPAIR, as well as the density of reducer: monthly records are required for using all compliant materials, daily volume weighted average records are required if an individual coating exceeds the 4.8 lbs VOC/gallon minus water limit as applied.<sup>2</sup> **(R°336.702(d))**
4. Permittee shall calculate and record the VOC emission rates from EUFINALREPAIR in pounds per hour, tons per calendar year, and pounds per gallon of coating, minus water, as applied according to the methods outlined in Appendix 1.7 or an alternate method approved by DEQ-AQD: monthly records.<sup>2</sup> **(R°336.702(d))**
5. Permittee shall monitor the particulate collection system control equipment for EUFINALREPAIR as follows: **(R°336.1213(3), R°336.1910)**
  - a. For spray booths with downdraft water wash systems: The permittee shall monitor the condition of the downdraft water wash particulate control system through the use of alarms on water feed pumps or by daily visual inspection. Records of the date and time of alarm events and daily visual inspections shall be maintained. Additionally, records of the date and scope of any preventive or corrective maintenance conducted shall be maintained. If the alarm system option is selected, the permittee shall, at a minimum, conduct weekly visual inspections of the water wash system and document the observations.
  - b. For spray booths with dry filter systems: Permittee shall maintain a record of inspection (monthly) and maintenance (replacement of filters) to ensure proper operation of the dry filters.

See Appendix 1.7

## **VII. REPORTING**

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

See Appendix 1.8

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

NA

**IX. OTHER REQUIREMENT(S)**

NA

**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).

**EUSEALERADH  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Various sealers, adhesives, and fillers are applied in the body shop, the paint shop and the general assembly areas.

**Flexible Grouping ID:** NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

| Pollutant | Limit  | Time Period/ Operating Scenario  | Equipment   | Monitoring/ Testing Method             | Underlying Applicable Requirements |
|-----------|--|--|-------------|--|------------------------------------|
| 1. VOC    | 60.8 pph <sup>2</sup>  | Averaged over the operating hours in a calendar month, with the exception of testing pursuant to General Condition (GC) 13, when it shall be determined by the testing protocol agreed upon by AQD | EUSEALERADH | GC 13; SCs V.1, VI.1, VI.2, VI.3, VI.4 | <b>R°336.1220</b>                  |
| 2. VOC    | 4.9 pounds per gallon coating, minus water, as applied for glass adhesion body primer      | Calendar day volume weighted average as determined by the procedure specified in R°336.1621  | EUSEALERADH | SCs V.1, VI.2, VI.3, VI.4              | <b>R°336.1702(d), R°336.2040</b>   |
| 3. VOC    | 4.3 pounds per gallon of coating, minus water, as applied for clear coatings               | Calendar day volume weighted average as determined by the procedure specified in R°336.1621  | EUSEALERADH | SCs V.1, VI.2, VI.3, VI.4              | <b>R°336.1702(d), R°336.2040</b>   |
| 4. VOC    | 3.5 pounds per gallon of coating, minus water, as applied for air-dried coatings           | Calendar day volume weighted average as determined by the procedure specified in R°336.1621  | EUSEALERADH | SCs V.1, VI.2, VI.3, VI.4              | <b>R°336.1702(d), R°336.2040</b>   |
| 5. VOC    | 3.5 pounds per gallon of coating, minus water, as applied for extreme performance coatings | Calendar day volume weighted average as determined by the procedure specified in R°336.1621  | EUSEALERADH | SCs V.1, VI.2, VI.3, VI.4              | <b>R°336.1702(d), R°336.2040</b>   |

| Pollutant | Limit  | Time Period/ Operating Scenario   | Equipment   | Monitoring/ Testing Method      | Underlying Applicable Requirements |
|-----------|--|---|-------------|---------------------------------|------------------------------------|
| 6. VOC    | 3.0 pounds per gallon of coating, minus water, as applied for coatings not defined as clear, air-dried, extreme performance, truck final repair, glass adhesion body primer, or steel pail and drum interior | Calendar day volume weighted average as determined by the procedure specified in R°336.1621 | EUSEALERADH | SCs V.1, VI.2, VI.3, VI.4       | R°336.1702(d), R°336.2040          |
| 7. VOC    | 137 tpy <sup>2</sup>   | As determined on a 12 month rolling total at the end of each calendar month                 | EUSEALERADH | SCs V.1, VI.1, VI.2, VI.3, VI.4 | R°336.1220                         |

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. For EUSEALERADH, the Permittee shall determine the VOC content of each coating or material using federal Reference Test Method 24 at the time and temperature specified in the method or at representative time(s) and temperature(s) used to cure the related coating or material in practice as provided by ASTM D2369-98, 1.4 and Note 3. Alternatively, the VOC content may be determined from manufacturer’s formulation data. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content of each coating or material shall be verified by testing.<sup>2</sup> ((R°336.1213(3), R°336.1702(d))

See Appendix 1.5

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

1. Permittee shall monitor and record the production hours for EUSEALERADH: monthly record.<sup>2</sup> (R°336.1213(3))
2. Permittee shall monitor and record the quantity of coating and material used in EUSEALERADH: monthly records.<sup>2</sup> (R°336.702(d))
3. Permittee shall monitor and record the VOC content (pounds per gallon) and water content for all coatings used in EUSEALERADH: monthly records.<sup>2</sup> (R°336.702(d))

- 4 Permittee shall calculate and record the VOC emission rates from EUSEALERADH in pounds per hour, tons per calendar year, and pounds per gallon of coating, minus water, as applied according to the methods outlined in Appendix 1.7 or an alternate method approved by DEQ-AQD: monthly records.<sup>2</sup> **(R°336.702(d))**

**See Appendix 1.7**

**VII. REPORTING**

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

**See Appendix 1.8**

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

NA

**IX. OTHER REQUIREMENT(S)**

NA

**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).

**EUBOOTHCLEAN  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

The application of solvents to clean spray booths.

Flexible Grouping ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

| Pollutant | Limit                | Time Period/ Operating Scenario   | Equipment    | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-----------|----------------------|---|--------------|----------------------------|------------------------------------|
| 1. VOC    | 350 tpy <sup>2</sup> | As determined on a 12 month rolling total at the end of each calendar month | EUBOOTHCLEAN | SCs V.1, VI.1, VI.2, VI.3  | R°336.1220                         |

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

- For EUBOOTHCLEAN, the Permittee shall determine the VOC content, as applied and as received, for each material using federal Reference Method 24. Alternatively the VOC content may be determined from manufacturer’s formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content, and density of any coating or material shall be verified by testing using federal Reference Method 24.<sup>2</sup> (R°336.1213(3))

See Appendix 1.5

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

- Permittee shall monitor and record the quantity of coating and material used in EUBOOTHCLEAN: monthly records.<sup>2</sup> (R°336.1201(3))

2. Permittee shall monitor and record the VOC content (pounds per gallon) of coating and materials used in EUBOOTHCLEAN: monthly records.<sup>2</sup> **(R°336.1201(3))**
3. Permittee shall calculate and record the VOC emission rate from EUBOOTHCLEAN in tons per calendar year: monthly records.<sup>2</sup> **(R°336.201(3))**

**See Appendix 1.7**

**VII. REPORTING**

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

**See Appendix 1.8**

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

NA

**IX. OTHER REQUIREMENT(S)**

NA

**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).

**EUPURGE  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

This operation is the purging of applicators within the paint spray booth.

**Flexible Grouping ID**

NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

| Pollutant | Limit                | Time Period/ Operating Scenario   | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-----------|----------------------|---|-----------|----------------------------|------------------------------------|
| 1. VOC    | 650 tpy <sup>2</sup> | As determined on a 12 month rolling total at the end of each calendar month | EUPURGE   | SCs V.1, VI.1, VI.2, VI.3  | R°336.1220                         |

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

- For EUPURGE, the Permittee shall determine the VOC content, as applied and as received, for each material using federal Reference Method 24. Alternatively the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content shall be verified by testing using federal Reference Method 24.<sup>2</sup> (R°336.1213(3))

See Appendix 1.5

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

- Permittee shall monitor and record the quantity of coating and material used in EUPURGE: monthly records.<sup>2</sup> (R°336.1201(3))
- Permittee shall monitor and record the VOC content (pounds per gallon) of materials used in EUPURGE: monthly records.<sup>2</sup> (R°336.1201(3))

3. Permittee shall calculate and record the VOC emission rate from EUPURGE in tons per calendar year: monthly records.<sup>2</sup> **(R°336.201(3))**

See Appendix 1.7

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to Special Conditions 21 and 22 of Part A. **(R°336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to Special Condition 23 of Part A. Report shall be received by 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 Special Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R°336.1213(4)(c))**

See Appendix 1.8

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

NA

## **IX. OTHER REQUIREMENT(S)**

NA

### **Footnotes:**

<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).

**EUMISCSOLV  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

These activities consist of miscellaneous cleaning activities, bodywipe, general assembly clean-up, production equipment clean-up and maintenance equipment clean-up.

Flexible Grouping ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

| Pollutant | Limit                | Time Period/ Operating Scenario   | Equipment  | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-----------|----------------------|---|------------|----------------------------|------------------------------------|
| 1. VOC    | 307 tpy <sup>2</sup> | As determined on a 12 month rolling total at the end of each calendar month | EUMISCSOLV | SCs V.1, VI.1, VI.2, VI.3  | R°336.1220                         |

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

- For EUMISCSOLV, the Permittee shall determine the VOC content, as applied and as received, for each material using federal Reference Method 24. Alternatively the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content shall be verified by testing using federal Reference Method 24.<sup>2</sup> ((R°336.1213(3))

See Appendix 1.5

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. (R°336.1213(3)(b)(ii))

- Permittee shall monitor and record the quantity of coating and material used in EUMISCSOLV: monthly records.<sup>2</sup> (R°336.1201(3))
- Permittee shall monitor and record the VOC content (pounds per gallon) of materials used in EUMISCSOLV: monthly records.<sup>2</sup> (R°336.1201(3))

3. Permittee shall calculate and record the VOC emission rate from EUMISCSOLV in tons per calendar year: monthly records.<sup>2</sup> **(R°336.201(3))**

See Appendix 1.7

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to Special Conditions 21 and 22 of Part A. **(R°336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to Special Condition 23 of Part A. Report shall be received by 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 Special Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R°336.1213(4)(c))**

See Appendix 1.8

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

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<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).

**EU-Acoustical/Structural Foam  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A two-part polyurethane foam system that will be injected into the hollow areas of the vehicle.

**Flexible Group ID:**  
FG-AUTOMACT

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

| Pollutant  | Limit                      | Time Period/ Operating Scenario  | Equipment                      | Monitoring/ Testing Method | Underlying Applicable Requirements |
|--|----------------------------|----------------------------------|--------------------------------|----------------------------|------------------------------------|
| 1. VOC   | 230.0 Pounds* <sup>2</sup> | Per Calendar Day*                | EU-Acoustical/ Structural Foam | SC VI.2                    | R336.1205, R336.1224, R336.1225    |
| 2. VOC   | 33.6 Tons <sup>2</sup>     | Per 12 Month Rolling Time Period | EU-Acoustical/ Structural Foam | SC VI.2                    | R336.1224, R336.1225, R336.1702(a) |
| * Represents a monthly prorated calculated value |                            |                                  |                                |                            |                                    |

**II. MATERIAL LIMIT(S)**

| Material | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|----------|-------|---------------------------------|-----------|----------------------------|------------------------------------|
| 1. NA    | NA    | NA                              | NA        | NA                         | NA                                 |

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

- All waste foam materials shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R336.1224, R336.1225, R336.1702(a))<sup>2</sup>**

**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))**

- The VOC content of any material shall be determined using federal Reference Test Method 24 at representative time(s) and temperature(s) used to cure the related material in practice as provided by ASTM D2369-04, 1.7 and Note 3. Alternatively, the VOC may be determined from manufacturer's

formulation data. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content of each material shall be verified by testing. **(R336.1702(a), R336.2001, R336.2003 and R336.2004)<sup>2</sup>**

See Appendix 5

#### **VI. MONITORING/RECORDKEEPING**

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

1. The applicant shall maintain a current listing from the manufacturer of the chemical composition of each foam material including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request. **(R336.1224, R336.1225, R336.1702(a), 40 CFR 52.21)<sup>2</sup>**
2. The applicant shall keep monthly records, acceptable to the District Supervisor, Air Quality Division, of the following information for EU-Acoustical/Structural Foam:
  - a) A description of each material used and its VOC content in pounds per gallon (minus water and with water, where applicable).
  - b) The monthly usage rate of each material.
  - c) Records of the number of days of operation per calendar month.
  - d) The amount of each material reclaimed where applicable.
  - e) VOC emissions calculations determining the total VOC mass emissions in pounds per day (based upon a monthly proration) and tons per year based upon a 12-month rolling time period.

All such records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request. **(R336.1205, R336.1224, R336.1225 and R336.1702(a))<sup>2</sup>**

#### **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:

1. EU-Acoustical/Structural Foam may be vented to the outside atmosphere via general ventilation or discharged unobstructed vertically upwards to the ambient via a stack with the following parameters. **(R336.1225)<sup>1</sup>**

| Stack & Vent ID | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements          |
|-----------------|-------------------------------------|------------------------------------|---|
| 1. SV-          | 120.0 <sup>1</sup>                  | 35.5 <sup>1</sup>                  | R336.1225, R336.1901, 40 CFR 52.21(c) & (d) |

**IX. OTHER REQUIREMENT(S)**

1. NA

**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-1. 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  |
|-------------------|---|---|
| FGAUTOMACT        | Each new, reconstructed, or existing affected source as defined in Title 40 of the Code of Federal Regulations (CFR), Part 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts for new automobiles or new light duty trucks; AND/OR in which you choose to include, pursuant to 40 CFR 63.3082(c), any coating operations which apply coatings to new other motor vehicle bodies or body parts for new other motor vehicles; parts intended for use in new automobiles, new light duty trucks or new other motor vehicles; or aftermarket repair or replacement parts for automobiles, light duty trucks or other motor vehicles; and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c). This includes equipment covered by other permits, grandfathered equipment, and exempt equipment. | EUELPOSYSTEM,<br>EUFINALREPAIR,<br>EUPRIMERSURFACER,<br>EUTOPCOATSYSTEM,<br>EUGLASSINSTL,<br>EUSLRSADHS             |
| FGFUELFILL        | All gasoline storage tanks containing fuel for vehicle fuel filling operations. Vehicles being filled with gasoline shall be equipped with on-board refueling vapor recovery (ORVR), Stage II oxidizer, or other equivalent vapor control system.   | Gasoline fuel filling operations and all gasoline storage tanks containing fuel for vehicle fuel filling operations |
| FGCOLDCLEANERS    | Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.  | Each grandfathered cold cleaner or exempt cold cleaner  |
| FGTANKS           | Any existing (placed into operation before 7/1/79), new (placed into operation on or after 7/1/79) or modified storage tank that is exempt from the requirements of Rule 201 pursuant to Rule 284.  | Each Rule 284 exempt existing or new storage tank   |
| FGRULE287(c)      | Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and Rule 287(c).  | Each Rule 287(c) exempt emission unit   |

| Flexible Group ID | Flexible Group Description   | Associated Emission Unit IDs       |
|-------------------|--|------------------------------------|
| FGRULE290         | Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290. | Each Rule 290 exempt emission unit |

## FG-MACT FLEXIBLE GROUP CONDITIONS

**DESCRIPTION**

Each new, reconstructed, or existing affected source as defined in Title 40 of the Code of Federal Regulations (CFR), Part 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts for new automobiles or new light duty trucks; AND/OR in which you choose to include, pursuant to 40 CFR 63.3082(c), any coating operations which apply coatings to new other motor vehicle bodies or body parts for new other motor vehicles; parts intended for use in new automobiles, new light duty trucks or new other motor vehicles; or aftermarket repair or replacement parts for automobiles, light duty trucks or other motor vehicles; and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c). This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.

**POLLUTION CONTROL EQUIPMENT**

**I. EMISSION LIMIT(S)**

| Pollutant  | Limit                          | Time Period/<br>Operating Scenario | Equipment   | Monitoring/<br>Testing Method    | Underlying<br>Applicable Requirements |
|--|--------------------------------|------------------------------------|---|----------------------------------|---------------------------------------|
| 1. Organic HAP   | 0.60 lb per GACS <sup>2</sup>  | Calendar month                     | <b>Existing –<br/>FG-MACT WITH ECOAT</b>  | Condition Nos. III.2, V.1 & VI.3 | 40 CFR 63.3091(a)                     |
| 2. Organic HAP*  | 1.10 lbs per GACS <sup>2</sup> | Calendar month                     | <b>Existing –<br/>FG-MACT</b>   | Condition Nos. III.2, V.1 & VI.3 | 40 CFR 63.3091(b)                     |
| 3. Organic HAP   | 0.01 lb per lb of coating      | Calendar month                     | <b>New/Reconstructed or<br/>Existing – EU-SEALARADH</b>                                     | Condition Nos. III.2, V.1 & VI.3 | 40 CFR 63.3090(c) or 63.3091(c)       |
| 4. Organic HAP   | 0.01 lb per lb of coating      | Calendar month                     | <b>New/Reconstructed or<br/>Existing – EU-Acoustical/Structural<br/>Foam and EU-DEADNER</b> | Condition Nos. III.2, V.1 & VI.3 | 40 CFR 63.3090(d) or 63.3091(d)       |
| <ul style="list-style-type: none"> <li>• <b>FG-MACT</b> includes Guidecoat, Topcoat, Final Repair, Glass Bonding Primer, and Glass Bonding Adhesive operations plus all coatings and thinners, except for deadener materials and adhesive and sealers not part of glass bonding systems.</li> <li>• <b>FG-MACT WITH ECOAT</b> also includes Electrocoat operations in addition to all of the operations of FG-MACT.</li> <li>• <b>EU-ADHESIVES/SEALERS</b> include only adhesives and sealers that are not part of glass bonding systems.</li> </ul> |                                |                                    |   |                                  |                                       |
| * Permittee may choose to comply with this limit if the requirements of Condition No. I.5 is met.  |                                |                                    |   |                                  |                                       |

5. The permittee may choose to comply with either Special Condition numbers I.1 or I.2. The permittee may choose to comply with Special Condition number I.2 only if Electrocoat system (EU-ECOAT) meets either of the following requirements. **(40 CFR 63.3092)**
- a. Each individual material added to the Electrocoat system contains no more than 1.0 percent by weight of any organic HAP and no more than 0.10 percent by weight of any OSHA-defined carcinogenic organic HAP, or
  - b. The emissions from all Electrocoat bake ovens are captured and ducted to a CONTROL DEVICE having a minimum destruction or removal efficiency of at least 95 percent (by weight).

## II. MATERIAL LIMIT(S)

NA

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by all coating operations for which an emission limit has been established under Special Condition Nos. I.1 through I.4. The work practice plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented consistent with the requirements of 40 CFR 63.3094: The permittee shall comply with the applicable work practice plans at all times.
  - a. All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.
  - b. The risk of spills of organic-HAP containing coatings, thinners, cleaning materials, and waste materials must be minimized.
  - c. Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
  - d. Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
  - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.
  - f. Organic HAP emissions from cleaning and from purging of equipment associated with all coating operations subject to emission limits in Special Conditions Nos. I.1 through I.4 above must be minimized by a plan addressing:
    - i. Vehicle body wipe pursuant to 40 CFR 63.3094(c)(1)(i);
    - ii. Coating line purging pursuant to 40 CFR 63.3094(c)(1)(ii);
    - iii. Coating system flushing pursuant to 40 CFR 63.3094(c)(1)(iii);
    - iv. Cleaning of spray booth grates pursuant to 40 CFR 63.3094(c)(1)(iv);
    - v. Cleaning of spray booth walls pursuant to 40 CFR 63.3094(c)(1)(v);
    - vi. Cleaning of spray booth equipment pursuant to 40 CFR 63.3094(c)(1)(vi);
    - vii. Cleaning of external spray booth areas pursuant to 40 CFR 63.3094(c)(1)(vii);
    - viii. Additional housekeeping measures pursuant to 40 CFR 63.3094(c)(1)(viii).

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g). **(40 CFR 63.3100(c), 40 CFR 63.4493(b) and (c))**

The work practice plan shall not become part of the facility's Renewable Operating Permit (ROP). Revisions to the work practice plan likewise do not represent revisions to the facility's ROP. Copies of the current work practice plan and any earlier plan developed within the past 5 years are required to be made available for inspection and copying by the AQD upon request. **(40 CFR 63.3094)**

2. For any coating operation(s) for which HAP emission reductions due to the use of add-on control equipment are relied upon to demonstrate compliance with the emission limits in Special Condition Nos. I.1 through I.4 above, the permittee shall meet the operating limits specified in Table 1 of 40 CFR 63, Subpart IIII as identified below. The operating limits in Table 1 apply to the emission capture and add-on control systems on the coating operations. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3167. The operating limits shall be met at all times after they are established, except for periods of startup, shutdown and malfunction. **(40 CFR 63.3093, 40 CFR 63.3100(b) and (d) and Table 1)**

| Add-On Control Device   | Operating Limit   |
|---|---|
| Thermal Oxidizer  | The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3167(a).  |
| Catalytic Oxidizer  | <p>The average temperature measured just before the catalyst bed in any 3-hour period must not fall below the limit established according to 40 CFR 63.3167(b); and either:</p> <p>Ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according to 40 CFR 63.3167(b)(2); or,</p> <p>Develop and implement an inspection and maintenance plan according to 40 CFR 63.3167(b)(4).</p> |
| Regenerative Carbon Adsorber  | <p>The total regeneration desorbing gas (e.g., steam or nitrogen) mass flow for each carbon bed regeneration cycle must not fall below the total regeneration desorbing gas mass flow limit established according to 40 CFR 63.3167(c).</p> <p>The temperature of the carbon bed after completing each regeneration and any cooling cycle must not exceed the carbon bed temperature limit established according to 40 CFR 63.3167(c).</p>  |
| Condenser   | The average condenser outlet (product side) gas temperature in any 3-hour period must not exceed the temperature limit established according to 40 CFR 63.3167(d).  |
| Concentrators, Including Zeolite Wheels and Rotary Carbon Adsorbers   | The average desorption gas inlet temperature in any 3-hour period must not fall below the limit established according to 40 CFR 63.3167(e).   |
| Emission Capture System that is a Permanent Total Enclosure (PTE), Except for Downdraft Spray Booths, Flash-Off Areas, or Bake Ovens Associated with Downdraft Spray Booths | <p>The direction of the air flow at all times must be into the enclosure; and either:</p> <p>The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or,</p> <p>The pressure drop across the enclosure must be at least 0.007 inch water, as established in Method 204 of Appendix M to 40 CFR 51.</p>   |
| Emission Capture System that is not a PTE, Except for Downdraft Spray Booths, Flash-Off Areas, or Bake Ovens Associated with Downdraft Spray Booths                         | The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3167(f).  |

3. The permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) in accordance with 40 CFR 63.6(e)(3). This plan must address the startup, shutdown and corrective actions in the event of a malfunction of any emission capture system or add-on control device upon which compliance with any of the emission limits in Special Condition numbers I.1 through I.4 depends. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures. **(40 CFR 63.3100(f))**
  
4. The permittee shall operate and maintain FG-MACT including any emission capture system or add-on control device upon which compliance with any of the emission limits in Special Condition numbers I.1 through I.4 depends according to the provisions in 40 CFR 63.6(e)(1)(i). **(40 CFR 63.3100(d))**

5. The permittee shall maintain a log detailing the operation and maintenance of any emission capture system, add-on control device, or continuous parameter monitor upon which compliance with any of the emission limits in Special Condition numbers I.1 through I.4 depends. The log shall cover the period between the compliance date specified in 40 CFR 63.3083 and the date when the initial emission capture system and add-on control device performance tests have been completed, as specified in 40 CFR 63.3160. **(40 CFR 63.3100(e))**

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

NA

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.3130, 40 CFR 63.3131)**

1. The permittee shall perform the applicable performance tests and compliance demonstrations in accordance with 40 CFR 63.3150-3152, 40 CFR 63.3160-3161, 40 CFR 63.3163-3168, 40 CFR 63.3170-3171, and 40 CFR 63.3173. **(40 CFR, Part 63, Subpart IIII)**
2. The permittee may rely upon the results of capture, destruction or transfer efficiency tests that have been previously conducted upon written approval from the AQD District Supervisor. Any such previous tests must meet the criteria identified in 40 CFR 63.3160(c)(1) through (3). **(40 CFR 63.3160)**
3. The permittee shall determine the mass fraction of each organic HAP for each material used according to the procedures established under 40 CFR 63.3151(a)(1) through (5). The permittee may use USEPA Method ALT-017 as an alternative for any material used, after demonstrating that its use as an alternative test methodology for that material, has been approved by the USEPA pursuant to the requirements of 40 CFR 63.3151(a)(3) and 40 CFR 63.7. **(40 CFR 63.7, 40 CFR 63.3151)**

See Appendix 5

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.3131)**

1. The permittee shall compile all required records and complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the end of the calendar month following each compliance period unless otherwise specified in any monitoring/recordkeeping condition. **(R 336.1213(3))**
2. The permittee shall conduct an initial compliance demonstration for the initial compliance period described in 40 CFR 63.3150-3151, 40 CFR 63.3160-3161, or 40 CFR 63.3170-3171. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3083 and ends on the last day of the month following the compliance date. If the initial date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next month. **(40 CFR 63.3150, 40 CFR 63.3160, 40 CFR 63.3170, 40 CFR 63.3083(a) and (b))**
3. The permittee shall install, operate and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.3168(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.3168(b). **(40 CFR 63.3168)**
4. The permittee shall keep all records as required by 40 CFR 63.3130 in the format and timeframes outlined in 40 CFR 63.3131. **(40 CFR 63.3152(c), 40 CFR 63.3163(j))**
5. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date, for each compliance period:
  - a. A copy of each notification and report that is submitted to comply with 40 CFR, Part 63, Subpart IIII and the documentation supporting each notification and report. **(40 CFR 63.3130(a))**

- b. A current copy of information provided by materials suppliers or manufactures, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP for each coating, thinner and cleaning material, the density for each coating and thinner, and the volume fraction of coating solids for each coating. **(40 CFR 63.3130(b))**
  - c. For each coating or thinner used in FG-MACT or FG-MACT WITH ECOAT, the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids. **(40 CFR 63.3130(c))**
  - d. For each material used in EU-SEALERADH, EU-Acoustical/Structural Foam and EU-DEADNER, the mass used in each month and the mass organic HAP content. **(40 CFR 63.3130(c))**
  - e. Calculations of the organic HAP emission rate for FG-MACT or FG-MACT WITH ECOAT in pounds per gallon of applied coating solids. If permittee chooses to comply with the option identified in Special Condition I.5.a., a record of the weight fraction of each organic HAP in each material added to the Electrocoat system. These calculations and records must include all raw data, algorithms, and intermediate calculations. If the "Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-018 (Docket ID No. OAR-2002-0093 and Docket ID No. A-2001-22), is used, all data input to this protocol must be recorded. If these data are maintained as electronic files, the electronic files, as well as any paper copies must be maintained. **(40 CFR 63.3130(c), 40 CFR 63.3163, 40 CFR 63.3173)**
  - f. Calculation of the average monthly mass organic HAP content in pounds per pound of coating, for EU-SEALERADH, and EU-Acoustical/Structural Foam and EU-DEADNER combined. **(40 CFR 63.3130(c), 40 CFR 63.3152)**
  - g. The name, volume, mass fraction organic HAP content and density of each cleaning material used. **(40 CFR 63.3130(d) - (f))**
  - h. Any additional records pertaining to deviations; startup, shutdown or malfunctions; emission capture systems; performance testing; capture and control efficiency determinations; transfer efficiency determinations; work practice plans; and design and operation of control and monitoring systems for any emission capture system or add-on control device upon which compliance with any of the emission limits in Special Condition numbers I.1 through I.4 depends, pursuant to 40 CFR 63.3130(g) through (o). **(40 CFR 63.3130(g) – (o))**
  - i. Records pertaining to the design and operation of control and monitoring systems for any emission capture system or add-on control device upon which compliance with any of the emission limits in Special Condition numbers I.1 through I.4 depends must be maintained on-site for the life of the equipment in a location readily available to plant operators and inspectors. **(40 CFR 63.3130(o))**
6. For any coating operation(s) using add-on controls, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 of 40 CFR, Part 63, Subpart IIII for any emission capture system or add-on control device upon which compliance with any of the emission limits in Special Condition numbers I.1 through I.4 depends pursuant to 40 CFR 63.3163 and 40 CFR 63.3173 using the method(s) described below: **(40 CFR 63.3163, 40 CFR 63.3173 and Table 1)**

| <b>Add-On Control Device</b> | <b>Operating Limit</b>  | <b>Continuous Compliance Demonstration Method</b>  |
|------------------------------|---|--|
| Thermal Oxidizer             | The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3167(a).  | <ul style="list-style-type: none"> <li>a. Collect the combustion temperature data according to 40 CFR 63.3168(c);</li> <li>b. Reduce the data to 3-hour block averages; and</li> <li>c. Maintain the 3-hour average combustion temperature at or above temperature limit.</li> </ul>   |
| Catalytic Oxidizer           | <p>The average temperature measured just before the catalyst bed in any 3-hour period must not fall below the limit established according to 40 CFR 63.3167(b); and either:</p> <p>Ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according to 40 CFR 63.3167(b)(2); or,</p> <p>Develop and implement an inspection and maintenance plan according to 40 CFR 63.3167(b)(4).</p> | <ul style="list-style-type: none"> <li>a. Collect the temperature data according to 40 CFR 63.3168(c);</li> <li>b. Reduce the data to 3-hour block averages; and</li> <li>c. Maintain the 3-hour average temperature before the catalyst bed at or above the temperature limit.</li> </ul> <ul style="list-style-type: none"> <li>a. Collect the temperature data according to 40 CFR 63.3168(c);</li> <li>b. Reduce the data to 3-hour block averages; and</li> <li>c. Maintain the 3-hour average temperature difference at or above the temperature difference limit; or</li> </ul> <ul style="list-style-type: none"> <li>a. Maintaining an up-to-date inspection maintenance plan, records of annual catalyst activity checks, records of monthly inspections of the oxidizer system, and records of the annual internal inspections of the catalyst bed. If a problem is discovered during a monthly or annual inspection required by 40 CFR 63.3167(b)(4), take corrective action as soon as practicable consistent with the manufacturer's recommendations.</li> </ul> |
| Regenerative Carbon Adsorber | <p>The total regeneration desorbing gas (e.g., steam or nitrogen) mass flow for each carbon bed regeneration cycle must not fall below the total regeneration desorbing gas mass flow limit established according to 40 CFR 63.3167(c).</p> <p>The temperature of the carbon bed after completing each regeneration and any cooling cycle must not exceed the carbon bed temperature limit established according to 40 CFR 63.3167(c).</p>  | <ul style="list-style-type: none"> <li>a. Measure the total regeneration desorbing gas (e.g., steam or nitrogen) mass flow for each regeneration cycle according to 40 CFR 63.3168(d); and</li> <li>b. Maintain the total regeneration desorbing gas mass flow at or above the mass flow limit.</li> </ul> <ul style="list-style-type: none"> <li>a. Measure the temperature of the carbon bed after completing each regeneration and any cooling cycle according to 40 CFR 63.3168(d); and</li> <li>b. Operate the carbon beds such that each carbon bed is not returned to service until completing each regeneration and any cooling cycle until the recorded temperature of the carbon bed is at or below the temperature</li> </ul>   |

| <b>Add-On Control Device</b>  | <b>Operating Limit</b>  | <b>Continuous Compliance Demonstration Method</b>   |
|---|---|---|
|   |   | limit.  |
| Condenser   | The average condenser outlet (product side) gas temperature in any 3-hour period must not exceed the temperature limit established according to 40 CFR 63.3167(d).  | <ul style="list-style-type: none"> <li>a. Collect the condenser outlet (product side) gas temperature according to 40 CFR 63.3168(e);</li> <li>b. Reduce the data to 3-hour block averages; and</li> <li>c. Maintain the 3-hour average gas temperature at the outlet at or below the temperature limit.</li> </ul>   |
| Concentrators, Including Zeolite Wheels and Rotary Carbon Adsorbers   | The average desorption gas inlet temperature in any 3-hour period must not fall below the limit established according to 40 CFR 63.3167(e).   | <ul style="list-style-type: none"> <li>a. Collect the temperature data according to 40 CFR 63.3168(f);</li> <li>b. Reduce the data to 3-hour block averages; and</li> <li>c. Maintain the 3-hour average temperature at or above the temperature limit.</li> </ul>  |
| Emission Capture System that is a Permanent Total Enclosure (PTE), Except for Downdraft Spray Booths, Flash-Off Areas, or Bake Ovens Associated with Downdraft Spray Booths | <p>The direction of the air flow at all times must be into the enclosure; and either:</p> <p>The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or,</p> <p>The pressure drop across the enclosure must be at least 0.007 inch water, as established in Method 204 of Appendix M to 40 CFR 51.</p> | <ul style="list-style-type: none"> <li>a. Collect the direction of air flow, and either the facial velocity of air through all natural draft openings according to 40 CFR 63.3168(g)(1) or the pressure drop across the enclosure according to 40 CFR 63.3168(g)(2); and</li> <li>b. Maintain the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintaining the direction of air flow into the enclosure at all times.</li> </ul> |
| Emission Capture System that is not a PTE, Except for Downdraft Spray Booths, Flash-Off Areas, or Bake Ovens Associated with Downdraft Spray Booths                         | The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3167(f).  | <ul style="list-style-type: none"> <li>a. Collecting the gas volumetric flow rate or duct static pressure for each capture device according to 40 CFR 63.3168(g);</li> <li>b. Reducing the data to 3-hour block averages; and</li> <li>c. Maintaining the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limit.</li> </ul>  |

7. Permittee shall monitor or secure the valve or closure mechanism controlling each bypass line for each capture system upon which compliance with any of the emission limits in Special Condition numbers I.1 through I.4 depends in a non-bypass mode such that the valve or closure mechanism cannot be opened without creating a record that it was opened. The method used to monitor or secure the valve or closure mechanism must meet one of the following:

- a. Flow control position indicator requirements pursuant to 40 CFR 63.3168(b)(1)(i);
- b. Car-seal or lock-and-key valve closures requirements pursuant to 40 CFR 63.3168(b)(1)(ii);
- c. Valve closure monitoring requirements pursuant to 40 CFR 63.3168(b)(1)(iii);
- d. Automatic shutdown system requirements pursuant to 40 CFR 63.3168(b)(1)(iv).

If any bypass line is opened, a description of why the line was opened and the length of time it remained open must be included in the semi-annual compliance reports required in Special Condition number 12.18. **(40 CFR 63.3168(b))**

**VII. REPORTING**

- 1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- 2. Semi-annual 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. **(40 CFR 63.3120(a)(1), R 336.1213(3)(c)(i))**
- 3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
- 4. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.3120(a). The first time period covered by these reports shall be shortened so as to end on either June 30 or December 31, whichever comes first. These reports shall be due March 15 for the reporting period July 1 to December 31 and September 15 for the reporting period January 1 to June 30. **(40 CFR 63.3120(a))**
- 5. The Permittee shall submit applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), as specified in 40 CFR 63.3110. **(40 CFR, Part 63, Subparts A and IIII)**
- 6. For any coating operation(s) using add-on controls, the permittee shall submit all performance test reports for emission capture systems and add-on control devices, and reports of transfer efficiency tests as required by 40 CFR 63.3120(b). **(40 CFR 63.3120(b))**
- 7. If an emission capture system or add-on control device is used to comply with any of the emission limits in Special Condition numbers I.1 through I.4, and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified in 40 CFR 63.3120(c). **(40 CFR 63. 3120(c), 40 CFR 63.10(d))**

See Appendix 8

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

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

| Stack & Vent ID | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|-----------------|-------------------------------------|------------------------------------|------------------------------------|
| 1. 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 IIII for Surface Coating of Automobiles and Light Duty Trucks by the initial compliance date as they apply to FG-MACT. The permittee may choose an alternative compliance method not listed in FG-MACT by providing the appropriate notifications required under 40 CFR part 63.9(j), maintaining a log required by 40 CFR Part 70.6(9), and by complying with all applicable provisions required by Subpart IIII for the compliance option chosen. **(40 CFR 70.6(a)(9), 40 CFR Part 63.9(j), 40 CFR Part 63 Subparts A and IIII)**

**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).

**FGFUELFILL  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

All gasoline storage tanks containing fuel for vehicle fuel filling operations. Vehicles being filled with gasoline shall be equipped with on-board refueling vapor recovery (ORVR), Stage II oxidizer, or other equivalent vapor control system.

**Emission Units:** All storage tanks containing gasoline for vehicle fuel filling operations, gasoline fuel filling operations

**POLLUTION CONTROL EQUIPMENT**

Fixed roof on each storage tank, submerged fill pipe, vapor balance control.

**I. EMISSION LIMIT(S)**

| Pollutant | Limit               | Time Period/ Operating Scenario   | Equipment  | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-----------|---------------------|---|------------|----------------------------|------------------------------------|
| 1. VOC    | 12 tpy <sup>2</sup> | As determined on a 12 month rolling total at the end of each calendar month | FGFUELFILL | SCs V.1, VI.1, VI.2, VI.3  | R°336.1220                         |

**II. MATERIAL LIMIT(S)**

NA

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

NA

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

1. The permittee shall not load or allow the loading of gasoline from a delivery vessel into any existing stationary vessel of more than 2,000 gallons (7.57 cubic meters or 7,571 liters) capacity and which has a throughput of 250,000 or more gallons (946.4 cubic meters or 946,353 liters) per year, unless such stationary vessel is equipped with a permanent submerged fill pipe. **(R 336.1606(1))**
2. The permittee shall not load or allow the loading of gasoline from a delivery vessel into any new stationary vessel of more than 2,000 gallons (7.57 cubic meters or 7,571 liters) capacity unless such stationary vessel is equipped with a permanent submerged fill pipe. **(R 336.1703(1))**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of 5 years. **(R°336.1213(3)(b)(ii))**

1. NA

See Appendix 1.5

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. **(R°336.1213(3)(b)(ii))**

1. Permittee shall monitor and record the quantity of gasoline used in FGFUELFILL: monthly records.<sup>2</sup> **(R°336.1201(3))**
2. Permittee shall monitor and record the VOC content (pounds per gallon) of gasoline used in FGFUELFILL: monthly records.<sup>2</sup> **(R°336.1201(3))**
3. Permittee shall calculate and record the VOC emission rate from FGFUELFILL in tons per calendar year: monthly records. The emissions from the gasoline storage tanks will be determined using the latest EPA TANKS emission calculation program.<sup>2</sup> **(R°336.201(3))**
4. The permittee shall keep a record of the following for each storage vessel: **(R 336.1606, R 336.1703, 40 CFR Part 60, Subparts K, Ka or Kb)**
  - a. The identification (name, tank #, etc.).
  - b. Location within the plant.
  - c. The capacity of the vessel.
  - d. The date of installation / modification
  - e. The type of material contained in the vessel.
  - f. The true vapor pressure of the material contained in the vessel at actual storage conditions.
5. For each storage vessel subject to NSPS (40 CFR, Part 60, Subpart Kb) with a design capacity greater than 10,560 gallons (40 m<sup>3</sup>) but less than 19,800 gallons (75 m<sup>3</sup>), which are used to store volatile organic liquids, the permittee shall also record the dimensions of each vessel and an analysis showing the capacity of the storage vessel. **(40 CFR 60.116b(b))**
6. The permittee shall not construct, reconstruct, or modify any storage vessel used to store volatile organic liquids (VOL), to a capacity greater than 19,800 gallons (75 cubic meters) without notification to the Southeast Michigan District Supervisor, Air Quality Division. Such notification shall include an updated list of all NSPS subject VOL storage tanks with the capacity and date of installation/modification of each storage tank. **(R 336.1213(3))**

**See Appendix 1.7**

## **VII. REPORTING**

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

**See Appendix 1.8**

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

NA

**IX. OTHER REQUIREMENT(S)**

1. Any existing gasoline tank (placed into operation before 07/01/79) shall comply with the requirements of Rule 606. **(R 336.1606)**
2. Any new gasoline tank (placed into operation on or after 07/01/79) shall comply with the requirements of Rule 703. **(R 336.1703)**
3. Any gasoline tank or volatile organic liquid (VOL) storage tank shall comply with New Source Performance Standards or NSPS (40 CFR, Part 60, Subparts A, K, Ka, Kb) based upon installation or modification date and applicability and designation of affected facility provisions in 40 CFR §§60.110, 60.110a, and 60.110b. Construction, reconstruction, or modification dates are as follows: Subpart K: after June 11, 1973 and prior to May 19, 1978; Subpart Ka: after May 18, 1978 and prior to July 23, 1984; Subpart Kb: after July 23, 1984. **(40 CFR Part 60, Subparts A, K, Ka, Kb)**

**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).

|   |
|---|
| <b>FGCOLDCLEANERS<br/>FLEXIBLE GROUP CONDITIONS</b> |
|---|

**DESCRIPTION**

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

**Emission Unit:** Each cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv)

**POLLUTION CONTROL EQUIPMENT**

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

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

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

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

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

1. The cold cleaner must meet one of the following design requirements:
  - a. The air/vapor interface of the cold cleaner is no more than 10 square feet. **(R 336.1281(h))**
  - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
  - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
  - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
  - c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

## **V. TESTING/SAMPLING**

NA

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

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

## **VII. REPORTING**

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

See Appendix 8

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

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee may construct, reconstruct, modify, install or commence operation of any new or existing emission units under FGCOLDCLEANERS without modifying the ROP providing that it is not defined as a minor or significant modification to the ROP, as defined by R 336.1216(2) and R 336.1216(3), respectively, and the activity is not excluded from exemption by any provision of R 336.1278 and the Permittee meets the requirements of R 336.1278a for the activity. **(R 336.1278, R 336.1278a)**

|   |
|---|
| <b><i>FGTANKS</i></b><br><b>FLEXIBLE GROUP CONDITIONS</b> |
|---|

**DESCRIPTION**

Any existing (placed into operation before 7/1/79), new (placed into operation on or after 7/1/79) or modified storage tank that is exempt from the requirements of R 336.1201 pursuant to R 336.1284.

**Emission Units:** Each existing (placed into operation before 7/1/79), new (placed into operation on or after 7/1/79) or modified storage tank that is exempt from the requirements of Rule 201 pursuant to Rule 284

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall not load or allow the loading of gasoline from a delivery vessel into any existing stationary vessel of more than 2,000 gallons (7.57 cubic meters or 7,571 liters) capacity and which has a throughput of 250,000 or more gallons (946.4 cubic meters or 946,353 liters) per year, unless such stationary vessel is equipped with a permanent submerged fill pipe **(R 336.1606(1))**
2. The permittee shall not load or allow the loading of gasoline from a delivery vessel into any new stationary vessel of more than 2,000 gallons (7.57 cubic meters or 7,571 liters) capacity unless such stationary vessel is equipped with a permanent submerged fill pipe **(R 336.1703(1))**

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

1. Each storage vessel shall meet one of the following parameters:
  - a. Storage of butane, propane, or liquefied petroleum gas in a vessel with a capacity of less than 40,000 gallons (151.4 cubic meters or 151,417 liters). **(R 336.1284(b))**
  - b. The vessel and surge capacity contains lubricating, hydraulic, and thermal oils and indirect heat transfer fluids. **(R 336.1284(c))**
  - c. Storage of no. 1 to no. 6 fuel oil as specified in ASTM-D-396-95, gas turbine fuel oils nos. 2-GT to 4-GT as specified in ASTM-D2880-96 or diesel fuel oils nos. 2-D and 4-D as specified in ASTM-D-975-96. **(R 336.1284(d))**
  - d. Storage of sweet crude or sweet condensate is conducted in a vessel with a capacity of less than 40,000 gallons (151.4 cubic meters or 151,417 liters). **(R 336.1284(e))**
  - e. Gasoline storage and handling equipment handling less than 20,000 gallons (75.7 cubic meters or 75,708 liters) per day. **(R 336.1284(g))**

- f. Storage or transfer operations of volatile organic compounds or noncarcinogenic liquids is conducted in a vessel that has a capacity of not more than 40,000 gallons (151.4 cubic meters or 151,417 liters) where the contents have a true vapor pressure of not more than 1.5 psia (103.4 millibar) at the actual storage conditions. **(R 336.1284(i))**

## V. TESTING/SAMPLING

NA

See Appendix 5

## VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep a record of the following for each storage vessel: **(R 336.1606, R 336.1703, 40 CFR Part 60, Subparts K, Ka or Kb)**
  - a. The identification (name, tank #, etc.).
  - b. Location within the plant.
  - c. The capacity of the vessel.
  - d. The date of installation / modification.
  - e. The type of material contained in the vessel.
  - f. The true vapor pressure of the material contained in the vessel at actual storage conditions.
  - g. Annual material throughput and VOC emissions, as determined at the end of each calendar year, to verify compliance with Rule 278 requirements.
2. For each storage vessel subject to NSPS (40 CFR, Part 60, Subpart Kb) with a design capacity greater than 10,560 gallons (40 m<sup>3</sup>) but less than 19,800 gallons (75 m<sup>3</sup>), which are used to store volatile organic liquids, the permittee shall also record the dimensions of each vessel and an analysis showing the capacity of the storage vessel. **(40 CFR 60.116b(b))**
3. The permittee shall not construct, reconstruct, or modify any storage vessel used to store volatile organic liquids (VOL), to a capacity greater than 19,800 gallons (75 cubic meters) without notification to the Southeast Michigan District Supervisor, Air Quality Division. Such notification shall include an updated list of all NSPS subject VOL storage tanks with the capacity and date of installation/modification of each storage tank. **(R 336.1213(3))**

See Appendix 1.7

## VII. REPORTING

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

See Appendix 1.8

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

NA

**IX. OTHER REQUIREMENT(S)**

1. Any existing gasoline tank (placed into operation before 07/01/79) shall comply with the requirements of Rule 606. **(R 336.1606)**
2. Any new gasoline tank (placed into operation on or after 07/01/79) shall comply with the requirements of Rule 703 **(R 336.1703)**.
3. Any gasoline tank or volatile organic liquid (VOL) storage tank shall comply with New Source Performance Standards or NSPS (40 CFR, Part 60, Subparts A, K, Ka, Kb) based upon installation or modification date and applicability and designation of affected facility provisions in 40 CFR 60.110, 60.110a, and 60.110b. Construction, reconstruction, or modification dates are as follows: Subpart K: after June 11, 1973 and prior to May 19, 1978; Subpart Ka: after May 18, 1978 and prior to July 23, 1984; Subpart Kb: after July 23, 1984. **(40 CFR Part 60, Subparts A, K, Ka, Kb)**
4. The permittee may construct, reconstruct, modify, install or commence operation of any new or existing emission units under FGTANKS without modifying the ROP providing that it is not defined as a minor or significant modification to the ROP, as defined by R 336.1216(2) and R 336.1216(3), respectively, and the activity is not excluded from exemption by any provision of R 336.1278 and the Permittee meets the requirements of R 336.1278a for the activity. **(R 336.1278, R 336.1278a)**

**FGRULE287(c)**  
**FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and Rule 287(c).

**Emission Unit:** Each emission unit that is exempt from Rule 201 pursuant to Rule 287(c).

**POLLUTION CONTROL EQUIPMENT**

**I. EMISSION LIMIT(S)**

| Pollutant | Limit                 | Time Period/ Operating Scenario  | Equipment                                  | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-----------|-----------------------|--|--|----------------------------|------------------------------------|
| 1. VOC    | 2000 pounds per month | Calendar monthly total   | Individual Rule 287(c) exempt coating line | SC VI.2                    | R°336.1621(10), R°336.702(d)       |
| 2. VOC    | 10 tons per year      | 12-month rolling time period as determined at the end of each calendar month | Individual Rule 287(c) exempt coating line | SC VI.2                    | R°336.1621(10), R°336.702(d)       |
| 3. VOC    | 30 tons per year      | 12-month rolling time period as determined at the end of each calendar month | FGRULE287(c)                               | SC VI.2                    | R°336.1621(10), R°336.702(d)       |

**II. MATERIAL LIMIT(S)**

| Material    | Limit       | Time Period/ Operating Scenario    | Equipment                                  | Monitoring/ Testing Method | Underlying Applicable Requirement |
|-------------|-------------|------------------------------------|--|----------------------------|-----------------------------------|
| 1. Coatings | 200 gallons | Per month, as applied, minus water | Individual Rule 287(c) exempt coating line | SC V.1.a                   | R 336.1287(c)(i)                  |

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

1. The permittee shall not operate a miscellaneous paint spray booth unless a dry filter system or an equivalent particulate control system is installed and operating properly. (R 336.1910)

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

1. Any exhaust system that serves only coating spray equipment shall be equipped with a properly installed and operating particulate control system. (R 336.1287(c)(ii))

**V. TESTING/SAMPLING**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ Rule 287(c) Permit to Install Exemption Record form (EQP 3562) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
  - a. Volume of coating and reducer (solvent) used, as applied, minus water, in gallons. **(R 336.1287(c)(iii))**
  - b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. **(R 336.1213(3))**
2. The permittee shall calculate VOC mass emission rates for each individual exempt surface coating line and for all exempt surface coating lines combined, determining monthly and 12-month rolling totals: monthly record. **(R 336.1213(3))**

See Appendix 4

**VII. REPORTING**

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

See Appendix 8

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

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee may construct, reconstruct, modify, install or commence operation of any new or existing emission units under FGRULE287(c) without modifying the ROP providing that it is not defined as a minor or significant modification to the ROP, as defined by R 336.1216(2) and R 336.1216(3), respectively, and the activity is not excluded from exemption by any provision of R 336.1278 and the Permittee meets the requirements of R 336.1278a for the activity. **(R 336.1278, R 336.1278a)**

|  |
|--|
| <b>FGRULE290</b><br><b>FLEXIBLE GROUP CONDITIONS</b> |
|--|

**DESCRIPTION**

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

**Emission Unit:** Each emission unit exempt from Rule 201 pursuant to Rule 290.

**POLLUTION CONTROL EQUIPMENT**

**I. EMISSION LIMIT(S)**

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**
2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**
  - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**
  - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**
  - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**
  - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**
3. Each emission unit that emits noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), above, and all of the following provisions are met: **(R 336.1290(a)(iii))**
  - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**

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

**II. MATERIAL LIMIT(S)**

NA

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

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

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

NA

**V. TESTING/SAMPLING**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ Rule 290 Permit to Install Exemption Record form (EQP 3558) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**
  - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
  - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
  - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
  - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**
  - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
  - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**
  - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
- 3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating

conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

**VII. REPORTING**

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

See Appendix 8

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

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee may construct, reconstruct, modify, install or commence operation of any new or existing emission units under FGRULE290 without modifying the ROP providing that it is not defined as a minor or significant modification to the ROP, as defined by R 336.1216(2) and R 336.1216(3), respectively, and the activity is not excluded from exemption by any provision of R 336.1278 and the Permittee meets the requirements of R 336.1278a for the activity. **(R 336.1278, R 336.1278a)**

## **E. NON-APPLICABLE REQUIREMENTS**

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

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

## APPENDICES

### Appendix 1-1: Abbreviations and Acronyms

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

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

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

**Appendix 1-2. Schedule of Compliance**

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

**Appendix 1-3. Monitoring Requirements**

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 1-4. Recordkeeping**

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

**Appendix 1-5. Testing Procedures**

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

**Appendix 1-6. Permits to Install**

The following table lists any PTIs issued since the effective date of previously issued ROP No. MI-ROP-M4199-2003. This includes any PTI that were incorporated into the Source-wide PTI No MI-PTI-M4199-2009 through amendments or modifications and any PTI that remained off-permit until this ROP renewal.

| Permit to Install Number | Description of Equipment  | Corresponding Emission Unit(s) or Flexible Group(s) |
|--------------------------|---|---|
| 156-04                   | A two-part polyurethane foam system that will be injected into the hollow areas of the vehicle. | EU-Acoustical/<br>Structural Foam                   |

**Appendix 1-7. 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 EUELPOSYSTEM, EUPRIMERSURFACER, EUTOPCOATSYSTEM, EUDEADNER, EUFINALREPAIR, EUSEALERADH, EUBOOTHCLEAN, EUPURGE, EUMISCSOLV, FGFUELFILL, FGCOLDCLEANERS, FGWELDGRIND, FGTANKS, FGRULE287(c), FGRULE290.

1. The calculation procedure described in Rule 336.2040: Method for determination of volatile organic compound emissions from coating lines and graphic arts lines.

For EUFINALREPAIR, the following calculation method shall be used to demonstrate compliance with the final repair emission limit of 4.8 pounds per gallon coating, minus water, as applied, on calendar day volume weighted averaging period.

Follow the calculation method described in Rule 336.2040(a). Note: Monthly records are required for using all compliant materials, daily volume weighted average records are required if an individual coating exceeds the 4.8 lbs VOC/gallon minus water limit as applied.

- a. Determine the VOC content of each coating including dilution, minus water, as applied, "P" during the averaging period by using the method described in R336.12040(5).
- b. Determine the weight of VOC used during the averaging period "M" by using the method described in R336.12040(6).

$$M = \sum_{i=1}^z L_{ci} P$$

- c. Determine the total volume of coatings including dilution used on the coating line during the averaging period "G<sub>t</sub>" using the following equation:

$$G_t = \sum_{i=1}^z L_{ci}$$

- d. Determine the volume-weighted average weight of VOC per gallon, minus water, as applied, by the following equation:

$$P_a = M/G_t$$

- e. If "P<sub>a</sub>" is less than or equal to the specified emission limit, the coating line meets the emission limit.
2. The calculation procedure described in 40 CFR, Part 60, Subpart MM, 60.393: Performance test and compliance provisions.
  3. The calculation procedure described in EPA Protocol 450/3-88-018: Protocol for Determining the daily volatile organic compound emission rate of automobile and light duty truck topcoat operations.
  4. Actual value of transfer efficiency (TE) verified by testing in conformance with EPA Protocol 450/3-88-018 shall be used in VOC emission calculations to show compliance with the limit of 14.9 pounds per gallon (1.785 kilograms per liter) of applied coating solids based upon the EPA Protocol. The parameters that affect TE are described in Rule 336.2040 and EPA Protocol 450/3-88-018
  5. Actual overall destruction value verified by testing Booth / Oven split (oven loading) and destruction efficiency of an incinerator shall be used in VOC emission calculations. Overall destruction efficiency = (Fraction of VOC entering an incinerator from booth / oven split) multiplied by (Fraction of VOC destroyed by an incinerator from incinerator destruction efficiency). For example, if booth / oven split is 20 percent and incinerator destruction is 90 percent, overall control efficiency is 18 percent (0.90 \* 0.20 = 0.18). All parameters that affect TE influence oven loading as well.
  6. Tons per year = (current month's emissions) plus (sum of previous 11- month's emissions). This is to be determined at the end of each calendar month.
  7. Pounds per hour = Monthly emissions in pounds divided by number of production hours per month. This is to be determined at the end of each calendar month.

## **Appendix 1-8. Reporting**

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

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

### **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  
RENEWABLE OPERATING PERMIT**

**SECTION 2**

**General Motors  
Power House Operations**

SRN:M4199

LOCATED AT

2500 E. General Motors Blvd.

Permit Number: MI-ROP-M4199-2010

Effective Date: February 17, 2010

Expiration Date: February 17, 2015

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source- wide PTI No. MI-PTI-M4199-2010 pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

### General Provisions

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

of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

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

### **Equipment & Design**

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

### **Emission Limits**

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; “a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP.” The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
  - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
  - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<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). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

## Monitoring/Recordkeeping

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

## Certification & Reporting

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

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

## Permit Shield

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

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

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

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

## Revisions

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

## Reopenings

- 34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
  - 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(7))**

## Stratospheric Ozone Protection

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

## Risk Management Plan

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

## Emission Trading

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

### Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. <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, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. <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).

## **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<br>(Including Process Equipment & Control Device(s))  | Installation Date/<br>Modification Date | Flexible Group ID |
|------------------|---|---|-------------------|
| EUBOILER1        | Boiler capable of coal and natural gas fire, maximum heat input capacity of 84 MMBTU per hour; exhaust gases controlled by baghouse.  | 5/19/1981                               | FGPOWERHOUSE      |
| EUBOILER2        | Boiler capable of coal fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse.                 | 5/19/1981                               | FGBOILERS         |
| EUBOILER3        | Boiler capable of coal and natural gas fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse. | 5/19/1981,<br>2/25/2003                 | FGBOILERS         |
| EUBOILER4        | Boiler capable of coal fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse.                 | 5/19/1981                               | FGBOILERS         |
| EUASHCONVEYOR    | Pneumatic ash conveying system controlled by a vent filter.   | 5/19/1981                               | FGASHSYSTEM       |
| EUASHSILO        | Ash silo controlled by the ash silo vent filter.  | 5/19/1981                               | FGASHSYSTEM       |
| EUHOPPER         | A Coal unloading system for the powerhouse controlled by a spray wetting system.  | 5/19/1981                               | NA                |
| EUTEMPBOILER1    | Portable boiler capable of natural gas fire, maximum heat input capacity of 92 MMBTU per hour; equipped with low-NOx burners.         | 2/12/2003                               | FGTEMPBOILERS     |
| EUTEMPBOILER2    | Portable boiler capable of natural gas fire, maximum heat input capacity of 92 MMBTU per hour; equipped with low NOx burners.         | 2/12/2003                               | FGTEMPBOILERS     |

**EUHOPPER  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A Coal unloading system for the powerhouse controlled by a spray wetting system.

**Flexible Group ID:**

**POLLUTION CONTROL EQUIPMENT**

Spray wetting system.

**I. EMISSION LIMIT(S)**

| Pollutant | Limit  | Time Period/<br>Operating Scenario        | Equipment | Monitoring/<br>Testing Method | Underlying<br>Applicable<br>Requirements |
|-----------|--|---|-----------|-------------------------------|--|
| 1. VE     | Not to exceed 5 percent opacity <sup>2</sup> | As determined over any six-minute average | EUHOPPER  | VI.1                          | R°336.1220,<br>R°336.1331                |

**II. MATERIAL LIMIT(S)**

| Material | Limit | Time Period/<br>Operating Scenario | Equipment | Monitoring/<br>Testing Method | Underlying<br>Applicable<br>Requirements |
|----------|-------|------------------------------------|-----------|-------------------------------|--|
| 1. NA    | NA    | NA                                 | NA        | NA                            | NA                                       |

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

1. NA

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

1. The permittee shall equip, maintain, and operate a spray wetting system at EUHOPPER in a satisfactory manner.<sup>2</sup> (R°336.1213(3), R°336.1220, R°336.1910)

**V. TESTING/SAMPLING**

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

1. Permittee shall conduct a visible emission observation on EUHOPPER, during the operation of EUHOPPER, once every semiannual reporting period. Visible emission observations shall be performed in accordance with R°336.1303. Records of the date, time, duration, and results of visible emissions observations shall be maintained, as well as any corrective actions, if taken. (R°336.1213(3))

See Appendix 5

**VI. MONITORING/RECORDKEEPING**

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

1. Permittee shall maintain a record of preventative maintenance and malfunction programs for the spray wetting system servicing EUHOPPER. (R°336.1213(3), R°336.1911(2))

**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:

| <b>Stack &amp; Vent ID</b> | <b>Maximum Exhaust Dimensions (inches)</b> | <b>Minimum Height Above Ground (feet)</b> | <b>Underlying Applicable Requirements</b> |
|----------------------------|--|---|---|
| 1. NA                      | NA   | NA  | NA  |

**IX. OTHER REQUIREMENT(S)**

- 1. The permittee shall comply with all applicable provisions of the federal standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Subpart Y, as they apply to EUHOPPER.

**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               |
|-------------------|--|--|
| FGPOWERHOUSE      | Four boilers: EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4. EUBOILER1 capable of coal and natural gas fire, maximum heat input capacity of 84 MMBTU per hour; exhaust gases controlled by baghouse. EUBOILER2 capable of coal fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse. EUBOILER3 capable of coal fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse. EUBOILER4 capable of coal fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse. | EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4 |
| FGASHSYSTEM       | System for the conveyance and storage of ash, from collection at the boiler bottoms of FGPOWERHOUSE through conveyance to the disposal site. Fabric filter controls exist on EUASHSILO and on EUASHCONVEYOR.   | EUASHCONVEYOR, EUASHSILO                   |
| FGTEMPBOILERS     | NA   | EUTEMPBOILER1, EUTEMPBOILER2               |
|                   |  |  |

**FGPOWERHOUSE  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Four boilers: EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4. EUBOILER1 capable of coal and natural gas fire, maximum heat input capacity of 84 MMBTU per hour; exhaust gases controlled by baghouse. EUBOILER2 capable of coal fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse. EUBOILER3 capable of coal fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse. EUBOILER4 capable of coal fire, maximum heat input capacity of 248 MMBTU per hour; exhaust gases controlled by baghouse.

**Emission Unit:** EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4

**POLLUTION CONTROL EQUIPMENT**

Baghouse on the exhaust from each boiler.

**I. EMISSION LIMIT(S)**

| Pollutant          | Limit   | Time Period/ Operating Scenario  | Equipment                  | Monitoring/ Testing Method                       | Underlying Applicable Requirements                           |
|--------------------|---|--|----------------------------|--|--|
| 1. PM              | 0.03 lbs. per MMBTU <sup>2</sup>                        | As determined averaged over a three-hour time period by testing, when requested by AQD or otherwise determined by the testing protocol agreed upon by AQD. | FGPOWERHOUSE, collectively | GC13; SCs III.3, V.1                             | R°336.1220   |
| 2. PM              | 65.2 tons per 12-month rolling time period <sup>2</sup> | As determined at the end of each calendar month  | FGPOWERHOUSE, collectively | SCs III.2, VI.2                                  | R°336.1220   |
| 3. NO <sub>2</sub> | 0.6 lbs. per MMBTU <sup>2</sup>                         | 24-hr average  | FGPOWERHOUSE, collectively | GC 13; SCs II.2, III.1, VI.1, VI.3, VII.1, VII.3 | 40 CFR 52.21   |
| 4. SO <sub>2</sub> | 420 ppmv, corrected to 50% excess air                   | As determined averaged over a three-hour time period or otherwise determined by the testing protocol agreed upon by AQD.                                   | FGPOWERHOUSE, collectively | GC 13; SCs V.2, V.3                              | 45 FR 29720, 55 FR 11029, Michigan State Implementation Plan |
| 5. SO <sub>2</sub> | 1.1 lbs. per MMBTU <sup>2</sup>                         | 24-hr average  | FGPOWERHOUSE, collectively | GC 13; SCs V.2, V.3, VI.1                        | R°336.1401, 40 CFR 52.21                                     |
| 6. VOC             | 2.4 lbs. per hr <sup>2</sup>                            | As determined averaged by the testing protocol agreed upon by AQD.   | FGPOWERHOUSE, collectively | GC 13; SCs V.4, VI.4                             | R°336.1220   |
| 7. VE              | Not to exceed 10 percent opacity <sup>2</sup>           | As determined over any six-minute average  | FGPOWERHOUSE, collectively | SCs III.3, VI.5, VII.2                           | R°336.1220, R°336.1331                                       |

**II. MATERIAL LIMIT(S)**

| Material                  | Limit                                      | Time Period/ Operating Scenario | Equipment                  | Monitoring/ Testing Method | Underlying Applicable Requirements   |
|---------------------------|--|---------------------------------|----------------------------|----------------------------|--|
| 1. Sulfur content of coal | 0.7 percent sulfur, by weight <sup>2</sup> | Instantaneous                   | FGPOWERHOUSE, collectively | SC V.3                     | <b>R°336.1401, 40 CFR 52.21 45 FR 29720, 55 FR 11029, Michigan State Implementation Plan</b> |

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

1. The heat input for FGPOWERHOUSE shall not exceed 4.35 x10<sup>6</sup> MMBTU per year.<sup>2</sup> **(R°336.1220)**
2. The Permittee shall not operate FGPOWERHOUSE unless the baghouses servicing FGPOWERHOUSE are installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes the following:
  - a. The Permittee shall not operate FGPOWERHOUSE unless the program for preventative maintenance of the bag filter collector is followed. Records of preventative maintenance shall be maintained on file for a period of five years.<sup>2</sup> **((R°336.1213(3)(b)(ii)), R°336.1910, R°336.1911)**
  - b. The Permittee shall not operate FGPOWERHOUSE unless the Abatement Measures and Reporting Procedures for Bag Filter Malfunctions at the Detroit Hamtramck Powerhouse Operations are followed.<sup>2</sup> **(R°336.1301, R°336.1331, R°336.1901)**
3. Upon detecting CAM exceedance(s)/excursion(s), the permittee shall restore operation of the pollutant specific emission unit, including control device and associated pollutant capture system equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. **(40 CFR 64.7(d))**
4. When using coal, the permittee shall only use coal with a heating value that is greater than 11,000 BTU per pound to fire its powerhouse boilers. The heating values shall be the gross calorific value determined on a moist, mineral matter free basis. The moist, mineral matter free BTU/pound shall be calculated using the formula contained in the US Department of Energy, Form EIA-7A, Coal Production Report dated March 2002. This report is attached to Consent Order AQD No. 4-2005 as exhibit B and incorporated by reference. **(Consent Order AQD No. 4-2005)**

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

1. NA

**V. TESTING/SAMPLING**

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

1. Within 360 calendar days of the issuance of this ROP, verification of the PM pounds per MMBTU emission rate from FGPOWERHOUSE, by testing at Permittee's expense, in accordance with Department requirements, will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R°336.1213(3), R°336.2001, R°336.2003, R°336.2004)**

2. Upon request of the AQD, verification of the SO<sub>2</sub> ppmv, corrected to 50% excess air, and pound per MMBTU emission rates from FGPOWERHOUSE, by testing at Permittee's expense, in accordance with Department requirements, will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R°336.1213(3), R°336.2001, R°336.2003, R°336.2004, 45 FR 29720, 55 FR 11029, Michigan State Implementation Plan)**
3. The permittee shall monitor for sulfur-in-coal according to the following:
  - a. For each shipment of coal received by the permittee, the permittee shall obtain from the vendor an analysis containing the following: moisture (percent by weight), ash content (percent by weight as received), sulfur content (percent by weight as received, percent by weight dry), and BTU content (percent by weight dry, per pound as received, and per pound dry). Permittee shall maintain records of date, time, locations of samples collected, and test results obtained. Records of vendor analyses shall be maintained on file.
  - b. Once per calendar month, the permittee shall verify that the sulfur content of a shipment of coal received during the calendar month is in compliance with the sulfur in coal limit established in SC II.1. The sampling and analytical procedures used shall be acceptable to the AQD. Records of analyses shall be maintained on file.

The procedures delineated in this condition may be modified with the prior approval of the AQD.<sup>2</sup> **(R°336.1213(3), R°336.1401, 40 CFR 52.21, 45 FR 29720, 55 FR 11029, Michigan State Implementation Plan)**

4. Upon request of the AQD, verification of VOC emission rates from FGPOWERHOUSE, by testing at Permittee's expense, in accordance with Department requirements, will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R°336.1213(3), R°336.2001, R°336.2003, R°336.2004)**

See Appendix 2.5

## **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 keep records of daily and annual fuel consumption of FGPOWERHOUSE.<sup>2</sup> **(R°336.1401, 40 CFR 52.21)**
2. Permittee shall calculate the PM emission rate from FGPOWERHOUSE, on a tons per month basis and on a tons per 12-month rolling time period basis, as determined at the end of each calendar month. The calculation shall be based on emission and/or heat content factors obtained from the most recent test data obtained from FGPOWERHOUSE and fuel usage records for FGPOWERHOUSE. Should test data be unavailable, the Permittee shall use emission factors and heat content factors from the most recent edition of the US EPA AP-42, or alternative emission and heat content factors acceptable to the MDEQ.<sup>2</sup> **(R°336.1201(3), R°336.1220)**
3. The Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record for NO<sub>x</sub> emissions from FGPOWERHOUSE on a continuous basis during all time periods that FGPOWERHOUSE operates. The CEM data shall be used for determining compliance with the NO<sub>2</sub> emission limitation expressed on a lbs. per MMBTU basis. Installation, calibration, maintenance, and operation shall be in accordance with the specifications outlined in Appendix 2.3 of this Section to the ROP. Permittee shall maintain records of NO<sub>x</sub> emissions measurements and other data necessary to determine compliance with the emission limitation and to determine satisfactory installation, calibration, maintenance, and operation of the NO<sub>x</sub> CEM.<sup>2</sup> **(R 336.1213(3), 40 CFR 52.21)**

4. Permittee shall maintain a calculation of the VOC emission rate from FGPOWERHOUSE, on a pph basis, determined by dividing the pound of VOC emitted per month by the monthly operating hours. The calculation shall be based on emission and/or heat content factors obtained from the most recent test data obtained from FGPOWERHOUSE and the maximum rated capacity of FGPOWERHOUSE. Should test data be unavailable, the Permittee shall use emission factors and heat content factors from the most recent edition of the US EPA AP-42, or alternative emission and heat content factors acceptable to the MDEQ. **(R°336.1213(3))**
5. The Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record for visible emissions from FGPOWERHOUSE on a continuous basis. The COM data shall be used for determining compliance with the visible emission limitation. Installation, calibration, maintenance, and operation shall be in accordance with the specifications outlined in Appendix 2.3 of this Section to the ROP. Permittee shall maintain records of visible emissions measurements and other data necessary to determine compliance with the emission limitation and to determine satisfactory installation, calibration, maintenance, and operation of the COM. **(R°336.1213(3))**
6. Permittee shall maintain on record a certification from the natural gas supplier, or some alternative demonstration acceptable to the AQD, that the natural gas combusted in FGPOWERHOUSE meets the specifications of pipeline natural gas. **(R°336.1213(3))**
7. The permittee shall utilize COMS-recorded opacity as an indicator of the flexible groups compliance with the particulate matter emission limit in special condition I.1. An excursion of the PM emission limit shall be defined as 2 consecutive 1-hour block average opacity greater than 10%. **(40 CFR 64.6(c)(1)(i & ii), and (2))**
8. The permittee shall operate the COMS during all required periods when the coal fired boiler is operating. Data recorded during monitoring malfunctions, repair activities and QA/QC operations shall not be used for 40 CFR part 64 compliance. **(40 CFR 64.6(c)(3), 64.7(c))**
9. The permittee shall perform an annual COMS audit using certified filters to ensure accurate opacity readings. **(40 CFR 64.6(c)(1)(iii))**

**See Appendix 2.3, 2.4, and/or 2.7**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Permittee shall provide NO<sub>x</sub> emissions reporting and NO<sub>x</sub> CEM performance reporting as specified in Appendix 2.8B of this Section to the ROP. **(R°336.1213(3))**
5. Permittee shall provide visible emissions reporting and COM performance reporting as specified in Appendix 2.8B of this Section to the ROP. **(R°336.1213(3))**
6. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there were no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

**See Appendix 2.8**

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

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

| <b>Stack &amp; Vent ID</b> | <b>Maximum Exhaust Dimensions (inches)</b> | <b>Minimum Height Above Ground (feet)</b> | <b>Underlying Applicable Requirements</b>                              |
|----------------------------|--|---|--|
| 1. SV043 - FGPOWERHOUSE    | 120 <sup>2</sup>                           | 250 <sup>2</sup>                          | <b>R<sup>o</sup>336.1225,<br/>40 CFR 52.21(c),<br/>40 CFR 52.21(d)</b> |

**IX. OTHER REQUIREMENT(S)**

1. For the purposes of Compliance Assurance Monitoring (CAM), excursions will be defined as follows:  
**(64.6(c)(2))**
  - a) an opacity excursion is defined as 2 consecutive 1-hour block average opacity values greater than 10 percent as required in special condition VI.7.
  - b) A monitoring excursion is defined as a failure to properly implement and/or maintain the preventative maintenance program as required special condition III.3

**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).

**FGASHSYSTEM  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

System for the conveyance and storage of ash, from collection at the boiler bottoms of FGPOWERHOUSE through conveyance to the disposal site.

**Emission Unit:** EUASHCONVEYOR, EUASHSILO

**POLLUTION CONTROL EQUIPMENT**

Fabric filters.

**I. EMISSION LIMIT(S)**

| Pollutant | Limit  | Time Period/ Operating Scenario  | Equipment     | Monitoring/ Testing Method | Underlying Applicable Requirements |
|-----------|--|--|---------------|----------------------------|------------------------------------|
| 1. PM     | 0.01 lbs. per 1000 lbs. of exhaust gas, calculated on a dry gas basis <sup>2</sup> | As determined by the testing protocol agreed upon by AQD                     | EUASHCONVEYOR | SCs IV.1, V.1              | R°336.1220, R°336.1331             |
| 2. PM     | 0.01 lbs. per 1000 lbs. of exhaust gas, calculated on a dry gas basis <sup>2</sup> | As determined by the testing protocol agreed upon by AQD                     | EUASHSILO     | SCs IV.1, V.2              | R°336.1220, R°336.1331             |
| 3. PM     | 10.2 tpy <sup>2</sup>  | 12-month rolling time period as determined at the end of each calendar month | FGASHSYSTEM   | SCs VI.1, VI.2             | R°336.1220                         |

**II. MATERIAL LIMIT(S)**

| Material | Limit | Time Period/ Operating Scenario | Equipment | Monitoring/ Testing Method | Underlying Applicable Requirements |
|----------|-------|---------------------------------|-----------|----------------------------|------------------------------------|
| 1.NA     | NA    | NA                              | NA        | NA                         | NA                                 |

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

1. Wetted ash, discharged from the ash storage silo through the pug mill, shall be transported to disposal sites in covered trucks as to prevent generation of fugitive dust emissions.<sup>2</sup> (R°336.1372(3))

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

1. The permittee shall equip, maintain, and operate the fabric filters servicing FGASHSYSTEM in a satisfactory manner. (R°336.1213(3), R°336.1910, R°336.1911)

**V. TESTING/SAMPLING**

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

1. Upon request of AQD, verification of PM pounds per 1000 pounds of exhaust gas, calculated on a dry gas basis, from FGASHCONVEYOR, by testing at permittee's expense, in accordance with Department requirements, will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R°336.1213(3), R°336.2001, R°336.2003, R°336.2004)**
2. Upon request of AQD, verification of PM pounds per 1000 pounds of exhaust gas, calculated on a dry gas basis, from FGASHSILO, by testing at permittee's expense, in accordance with Department requirements, will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R°336.1213(3), R°336.2001, R°336.2003, R°336.2004)**

See Appendix 2.5

**VI. MONITORING/RECORDKEEPING**

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

1. Permittee shall calculate, and maintain a record of, the PM emission rate from FGASHSYSTEM, on a tons per year basis as determined at the end of each calendar year.<sup>2</sup> **(R°336.1213(3))**
2. Permittee shall maintain a record of preventative maintenance and malfunction programs for each fabric filter servicing each emission unit of FGASHSYSTEM. **(R°336.1213(3), R°336.1911(2))**

See Appendix 2.3, 2.4, and/or 2.7

**VII. REPORTING**

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

See Appendix 8

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

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

| Stack & Vent ID | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|-----------------|-------------------------------------|------------------------------------|------------------------------------|
| 1. NA           | NA                                  | NA                                 | NA                                 |

**IX. OTHER REQUIREMENT(S)**

1. NA

**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).

**FGTEMPBOILERS  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Two portable boilers, each capable of natural gas fire, each with a maximum heat input capacity of 92 MMBTU per hour; and each equipped with Low-NOX burners

**Emission Unit:** EUTEMPBOILER1, EUTEMPBOILER2

**POLLUTION CONTROL EQUIPMENT**

Low-NOX burners on each boiler.

**I. EMISSION LIMIT(S)**

| Pollutant          | Limit   | Time Period/ Operating Scenario   | Equipment                   | Monitoring/ Testing Method        | Underlying Applicable Requirements |
|--------------------|---|---|-----------------------------|-----------------------------------|------------------------------------|
| 1. CO              | 0.14 lbs. per MMBTU heat input <sup>2</sup>             | As determined on a 24-hr rolling average  | FGTEMPBOILERS, collectively | GC 13; SCs II.2, VI.1, VI.2       | R°336.1205(1)(a),<br>R°336.1205(3) |
| 2. CO              | 25.8 lbs. per hr <sup>2</sup>                           | As determined averaged over a three-hour time period or otherwise determined by the testing protocol agreed upon by AQD | FGTEMPBOILERS, collectively | GC 13; SCs II.2, VI.1, VI.3       | R°336.1205(1)(a),<br>R°336.1205(3) |
| 3. CO              | 32.4 tons per 12-month rolling time period <sup>2</sup> | As determined at the end of each calendar month   | FGTEMPBOILERS, collectively | SCs II.1, II.2, VI.1, VI.4        | R°336.1205(1)(a),<br>R°336.1205(3) |
| 4. NO <sub>x</sub> | 0.05 lbs. per MMBTU heat input <sup>2</sup>             | As determined on a 24-hr rolling average  | FGTEMPBOILERS, collectively | GC 13; SCs II.2, VI.1, VI.5, VI.8 | R°336.1205(1)(a),<br>R°336.1205(3) |
| 5. NO <sub>x</sub> | 9.2 lbs. per hr <sup>2</sup>                            | As determined averaged over a three-hour time period or otherwise determined by the testing protocol agreed upon by AQD | FGTEMPBOILERS, collectively | GC 13; SCs II.2, VI.1, VI.6, VI.8 | R°336.1205(1)(a),<br>R°336.1205(3) |
| 6. NO <sub>x</sub> | 11.6 tons per 12-month rolling time period <sup>2</sup> | As determined at the end of each calendar month   | FGTEMPBOILERS, collectively | SCs II.1, II.2, VI.1, VI.7, VI.8  | R°336.1205(1)(a),<br>R°336.1205(3) |

**II. MATERIAL LIMIT(S)**

| Material       | Limit   | Time Period/ Operating Scenario                 | Equipment                   | Monitoring/ Testing Method | Underlying Applicable Requirements |
|----------------|---|---|-----------------------------|----------------------------|------------------------------------|
| 1. Natural Gas | 463.7 MM cubic feet per 12-month rolling time period <sup>2</sup> | As determined at the end of each calendar month | FGTEMPBOILERS, collectively | SC VI.1                    | R°336.1205(1)(a),<br>R°336.1205(3) |

2. The Permittee shall not combust any fuel in FGTEMPBOILERS except for natural gas.<sup>2</sup> **(R°336.1205(1)(a), R°336.1205(3))**

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

1. NA

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

1. NA

### **V. TESTING/SAMPLING**

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

1. NA

**See Appendix 5**

### **VI. MONITORING/RECORDKEEPING**

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

1. For each emission unit within this flexible group, the Permittee shall keep daily fuel usage records, in a format acceptable to the AQD District Supervisor, indicating the total amount of each fuel combusted in the emission unit on a daily time period basis. For natural gas usage, the records shall be maintained in units of cubic feet.<sup>2</sup> **(R°336.1201(3), R°336.1205(1)(a), R°336.1213(3), 40 CFR 60.48c(g))**
2. Permittee shall maintain on file a calculation of the CO emission rate from FGTEMPBOILERS, on a pounds per MMBTUs heat input basis. The calculation shall be based on rental boiler emission and/or heat content factors for EUTEMPBOILER1 and EUTEMPBOILER2 and the maximum rated capacity of FGTEMPBOILERS. Should rental boiler data be unavailable, the Permittee shall use emission factors and heat content factors from the most recent edition of the US EPA AP-42, or alternative emission and heat content factors acceptable to the MDEQ. **(R°336.1213(3))**
3. Permittee shall maintain a calculation of the CO emission rate from FGTEMPBOILERS, on a pph basis. The calculation shall be based on rental boiler emission and/or heat content factors for EUTEMPBOILER1 and EUTEMPBOILER2 and the maximum rated capacity of FGTEMPBOILERS. Should rental boiler data be unavailable, the Permittee shall use emission factors and heat content factors from the most recent edition of the US EPA AP-42, or alternative emission and heat content factors acceptable to the MDEQ. **(R°336.1213(3))**
4. Permittee shall calculate the CO emission rate from FGTEMPBOILERS, on a tons per month basis and on a tons per 12-month rolling time period basis, as determined at the end of each calendar month. The calculation shall be based on rental boiler emission and/or heat content factors for EUTEMPBOILER1 and EUTEMPBOILER2 and the fuel usage records for FGTEMPBOILERS. Should rental boiler data be unavailable, the Permittee shall use emission factors and heat content factors from the most recent edition of the US EPA AP-42, or alternative emission and heat content factors acceptable to the MDEQ. **(R°336.1213(3))**
5. Permittee shall maintain a calculation of the NO<sub>x</sub> emission rate from FGTEMPBOILERS, on a pounds per MMBTUs heat input basis. The calculation shall be based on emission and/or heat content factors obtained from the most recent test data obtained from EUTEMPBOILER1 and EUTEMPBOILER2 and the maximum rated capacity of FGTEMPBOILERS. Should rental boiler data be unavailable, the Permittee shall use emission factors and heat content factors from the most recent edition of the US EPA AP-42, or alternative emission and heat content factors acceptable to the MDEQ. **(R°336.1213(3))**
6. Permittee shall maintain a calculation of the NO<sub>x</sub> emission rate from FGTEMPBOILERS, on a pph basis. The calculation shall be based on rental boiler emission and/or heat content factors for EUTEMPBOILER1 and

EUTEMPBOILER2 and the maximum rated capacity of FGTEMPBOILERS. Should rental boiler data be unavailable, the Permittee shall use emission factors and heat content factors from the most recent edition of the US EPA AP-42, or alternative emission and heat content factors acceptable to the MDEQ. **(R°336.1213(3))**

7. Permittee shall calculate the NO<sub>x</sub> emission rate from FGTEMPBOILERS, on a tons per month basis and on a tons per 12-month rolling time period basis, as determined at the end of each calendar month. The calculation shall be based on emission and/or heat content factors obtained from the most recent test data obtained from EUTEMPBOILER1 and EUTEMPBOILER2 and fuel usage records for FGTEMPBOILERS. Should test data be unavailable, the Permittee shall use emission factors and heat content factors from the most recent edition of the US EPA AP-42, or alternative emission and heat content factors acceptable to the MDEQ. **(R°336.1213(3))**
8. For any emission unit of FGTEMPBOILERS, the Permittee shall maintain written documentation from the boiler manufacturer certifying that low-NOX burners have been installed on that emission unit. **(R°336.1213(3))**

**See Appendix 2.3, 2.4, and/or 2.7**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. For each emission unit within this flexible group, the Permittee shall provide notification of the date of construction, the date of anticipated startup, and the date of actual startup. Notification of construction is due no later than 30 days after the commencement of construction. Notification of actual startup is due within 15 days after such date.<sup>2</sup> **(40 CFR 60.48c(a))**
5. The Permittee shall provide notification of the date of removal of FGTEMPBOILERS from the site. This notification shall be provided within 15 days of removal of FGTEMPBOILERS from the site.<sup>2</sup> **(R°336.1201(3))**

**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:

| <b>Stack &amp; Vent ID</b> | <b>Maximum Exhaust Dimensions (inches)</b> | <b>Minimum Height Above Ground (feet)</b> | <b>Underlying Applicable Requirements</b> |
|----------------------------|--|---|---|
| 1. SVTEMPBOILER1           | 60 inches by 60 inches <sup>2</sup>        | 18.5 <sup>2</sup>                         | <b>R°336.1225</b>                         |
| 2. SVTEMPBOILER2           | 60 inches by 60 inches <sup>2</sup>        | 18.5 <sup>2</sup>                         | <b>R°336.1225</b>                         |

**IX. OTHER REQUIREMENT(S)**

1. Each emission unit of FGTEMPBOILERS shall comply with all applicable requirements of the federal Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subparts A and Dc. **(40 CFR 60.1(a), 40 CFR 60.40c(a))**

**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).

## **E. NON-APPLICABLE REQUIREMENTS**

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

## APPENDICES

### Appendix 2-1: Abbreviations and Acronyms

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

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

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

## Appendix 2-2. Schedule of Compliance

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

## Appendix 2-3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FGPOWERHOUSE, SCs VI.3 and VI.5.

Installation, calibration, maintenance, and operation of the NO<sub>x</sub> CEM and COM shall meet the following requirements:

1. The span value shall be 2.0 times the lowest emission standard, unless an alternative span value is agreed upon by the AQD.
2. The CEM or COM shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and applicable (depending on the pollutant measured) Performance Specification of Appendix B, 40 CFR Part 60.
3. Each calendar quarter, the Permittee shall perform the Quality Assurance Procedures of the CEM set forth in Appendix F of 40 CFR Part 60.
4. The applicant shall perform an annual audit of the COM using the procedures set forth in USEPA Publication 450/4-92-010, "Performance Audit Procedures for Opacity Monitors", or an alternative procedure acceptable to the AQD.

The language in this appendix shall not be construed, on the basis of the language in this appendix alone, to conclude that any emission unit of FGPOWERHOUSE is subject to the federal Standards of Performance for New Stationary Sources (NSPS). The federal NSPS is not cited as an underlying applicable requirement for any requirement listed in this appendix.

## Appendix 2-4. 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 2-5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

## Appendix 2-6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. MI-ROP-M4199-2003. This includes any PTI that were incorporated into the Source-wide PTI No MI-PTI-M4199-2009 through amendments or modifications and any PTI that remained off-permit until this ROP renewal.

| Permit to Install Number | Description of Equipment  | Corresponding Emission Unit(s) or Flexible Group(s)  |
|--------------------------|---|--|
| 8-03<br><br>125-81C      | Two portable boilers, each capable of natural gas fire, each with maximum heat input capacity of 92 MM BTU per hour, and each equipped with low-NOx burners<br>Four stationary boilers with maximum heat input capacities of 84, 248, 248, and 248 MMBTU/hr. All four with coal-fire capacity, one 84 and one 248 with natural gas fire capacity, the 248 with natural gas fire controlled with low-NOx burners; pneumatic ash conveying system controlled by a vent filter; ash silo controlled by a vent filter; rail unloading system for coal | EUTEMPBOILER1,<br>EUTEMPBOILER2,<br>FGTEMPBOILERS<br>EUBOILER1,<br>EUBOILER2,<br>EUBOILER3,<br>EUBOILER4,<br>EUASHCONVEYOR,<br>EUASHSILO,<br>EUHOPPER,<br>FGPOWERHOUSE,<br>FGASHSYSTEM |
| C-5722 through C-5776    | All emission units at the stationary source   | All emission units in Section 1 and 2  |

**Appendix 2-7. Emission Calculations**

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

**Appendix 2-8. Reporting**

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

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

**B. Other Reporting**

The permittee shall use the following approved formats and procedures for the reporting requirements referenced in FG-POWERHOUSE. Alternative formats must be approved by the AQD District Supervisor.

1. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CEMS set forth in Appendix F of 40 CFR Part 60. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F)
2. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and/or the summary report in an acceptable format to the AQD, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:

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

COMS

1. The permittee shall perform an annual audit of the COMS using the procedures set forth in USEPA Publication 450/4-92-010, "Performance Audits Procedures for Opacity Monitors", or a procedure acceptable to AQD. Within 30 days following the end of the calendar quarter, the results of the annual audit shall be submitted to the AQD.
2. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and/or the summary report in an acceptable format to Air Quality Division, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:

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