

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

EFFECTIVE DATE: January 9, 2024

ISSUED TO

**EQ - A US Ecology Company - Michigan Disposal Waste Treatment Plant
and
Wayne Disposal, Inc.**

State Registration Number (SRN): M4782

LOCATED AT

49350 I-94 Service Drive, Belleville, Wayne County, Michigan 48111

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-M4782-2024

Expiration Date: January 9, 2029

Administratively Complete ROP Renewal Application
Due Between July 9, 2027 and July 9, 2028

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-M4782-2024

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

Michigan Department of Environment, Great Lakes, and Energy

Julie Brunner, ROP Central Unit Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

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Section 1 – EQ – A US Ecology Company

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

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

Emission Limits

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

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

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

Testing/Sampling

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

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Monitoring/Recordkeeping

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

Certification & Reporting

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

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

Permit Shield

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

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

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

Revisions

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

Reopenings

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

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Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

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Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSILO1-3	Three (3) identical treatment reagent and waste storage silos, each equipped with a baghouse, serving the west side waste treatment process.	07-01-1991	FGWEST FGTMTFACILITY FGMACTDD
EUSILO4-6	Three (3) identical treatment reagent and waste storage silos, each equipped with a baghouse, serving the east side waste treatment process.	07-01-1991	FGEAST FGTMTFACILITY FGMACTDD
EUSLUDGETANK12	40,000 gallon sludge tank (Tank 12), located in the east side waste treatment building. Controlled by a baghouse dust collector, regenerative thermal oxidizer, and wet scrubber, in series.	07-01-1991	FGEAST FGTMTFACILITY FGMACTDD
EUSTORAGETANK1	Four (4) waste storage and treatment tanks E, F, G, and H located in the east side waste treatment building. Controlled by a baghouse dust collector, regenerative thermal oxidizer, and wet scrubber, in series.	07-01-1991 / 06-01-1997	FGEAST FGTMTFACILITY FGMACTDD
EUSLUDGETANK11	40,000 gallon sludge tank (Tank 11), located in the west side waste treatment building. Controlled by a baghouse dust collector.	07-01-1991	FGWEST FGTMTFACILITY FGMACTDD
EUSTORAGETANK2	Four (4) waste storage and treatment tanks A, B, C, and D located in the west side waste treatment building. Controlled by a baghouse dust collector.	07-01-1991 / 06-01-1997	FGWEST FGTMTFACILITY FGMACTDD
EULIQWASTETK16	20,000 gallon liquid waste holding tank (Tank 16) controlled by two shared carbon adsorption canisters, in series.	07-01-1991	FGLIQWASTETKS FGTMTFACILITY FGMACTDD
EULIQWASTETK17	20,000 gallon liquid waste holding tank (Tank 17) controlled by two shared carbon adsorption canisters, in series.	07-01-1991	FGLIQWASTETKS FGTMTFACILITY FGMACTDD
EULIQWASTETK18	20,000 gallon liquid waste holding tank (Tank 18) controlled by two shared carbon adsorption canisters, in series.	07-01-1991	FGLIQWASTETKS FGTMTFACILITY FGMACTDD

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EULIQWASTETK19	20,000 gallon liquid waste holding tank (Tank 19) controlled by two shared carbon adsorption canisters, in series.	07-01-1991	FGLIQWASTETKS FGTMTFACILITY FGMACTDD
EULIQWASTETK21	18,000 gallon, cylindrical, vertical fiberglass tanks permitted (TSDF) to hold liquid waste.	10-01-1998	FGMACTDD
EULIQWASTETK25	20,000 gallon cylindrical, vertical fiberglass tanks permitted (TSDF) to hold liquid waste.	08-30-2004	FGMACTDD
EULIQWASTETK27	20,000 gallon cylindrical, vertical fiberglass tanks permitted (TSDF) to hold liquid waste.	08-30-2003	FGMACTDD
EUDRUMSTORAGE	North, East, and Southeast Container Storage Areas.	06-01-1990 / 07-19-2002	FGTMTFACILITY FGMACTDD
EUCOLDCLEANER	A cold cleaner unit located in the vehicle maintenance building and employs mineral spirits.	01-01-2010	FGCOLDCLEANERS

D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGEAST	East side waste treatment process consisting of sludge tank 12, treatment reagent and waste silos 4, 5, and 6, and waste treatment tanks 9a, 9b, 10a, and 10b.	EUSILO4-6 EUSLUDGETANK12 EUSTORAGETANK1
FGWEST	West side waste treatment process consisting of sludge tank 11, treatment reagent and waste silos 1, 2, and 3, and waste treatment tanks A, B, C, and D. Silos 1 through 3 are used to store reagent, including (but not limited to) fly ash, lime, and cement kiln dust. This process treats low VOC waste (average VOC content less than 500 ppm).	EUSILO1-3 EUSLUDGETANK11 EUSTORAGETANK2
FGLIQWASTETKS	Four 20,000-gallon liquid waste holding tanks.	EULIQWASTETK16 EULIQWASTETK17 EULIQWASTETK18 EULIQWASTETK19
FGTMTFACILITY	Waste treatment facility including all equipment in the east and west side processes, the liquid waste storage tanks, and the North, East, and Southeast container storage areas.	EUSLUDGETANK12 EUSTORAGETANK1 EUSLUDGETANK11 EUSTORAGETANK2 EULIQWASTETK16 EULIQWASTETK17 EULIQWASTETK18 EULIQWASTETK19 EUDRUMSTORAGE EUSILO1-3 EUSILO4-6

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Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACTDD	<p>The provisions of 40 CFR Part 63, Subpart DD apply to a plant site for which both of the following are applicable:</p> <ul style="list-style-type: none"> • One or more operations receive off-site materials as specified in 40 CFR 63.680(b) and the operation is one of the waste management operations or recovery operations as specified in 40 CFR 63.680(a)(2)(i) through (vi). • For each operation specified in 40 CFR 63.680(a)(2)(i) through (vi), the affected source is the entire group of off-site material management units (MMU) associated with the operation. An off-site MMU is a tank, container, surface impoundment, oil-water separator, organic-water separator, or transfer system used to manage off-site material as defined in 40 CFR 63.680(c)(1). <p>The provisions in this flexible group apply to closed-vent systems and control devices used to control air emissions.</p>	EUSLUDGETANK12 EUSTORAGETANK1 EUSLUDGETANK11 EUSTORAGETANK2 EULIQWASTETK16 EULIQWASTETK17 EULIQWASTETK18 EULIQWASTETK19 EULIQWASTETK21 EULIQWASTETK25 EULIQWASTETK27 EUDRUMSTORAGE EUSILO1-3 EUSILO4-6
FGCOLDCLEANERS	<p>Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.</p>	EUCOLDCLEANER

**FGEAST
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

East side waste treatment process consisting of sludge tank 12, treatment reagent and waste silos 4, 5, and 6, and waste treatment tanks 9a, 9b, 10a, and 10b.

Emission Units: EUSILO4-6, EUSLUDGETANK12, EUSTORAGETANK1

POLLUTION CONTROL EQUIPMENT

Baghouse dust collector, thermal oxidizer and caustic wet scrubber, in series. Each treatment reagent and waste storage silo has its own baghouse.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	22.85 pph ²	Hourly	FGEAST	SC V.1, V.2, VI.1, VI.2	R 336.1225 R 336.1702(a)
2. VOC	47.52 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGEAST	SC V.1, V.2, VI.1, VI.2, VI.3, VI.5, VI.6	R 336.1702(a)
3. Methylene chloride	14.92 pph ¹	Hourly	FGEAST	SC V.1, V.2, VI.1, VI.2	R 336.1225
4. Benzene	0.71 pph ¹	Hourly	FGEAST	SC V.1, V.2, VI.1, VI.2	R 336.1225
5. 1,1,2,2- Tetrachloroethane	0.16 pph ¹	Hourly	FGEAST	SC V.1, V.2, VI.1, VI.2	R 336.1225
6. Carbon tetrachloride	0.28 pph ¹	Hourly	FGEAST	SC V.1, V.2, VI.1, VI.2	R 336.1225
7. Chloroform	3.02 pph ¹	Hourly	FGEAST	SC V.1, V.2, VI.1, VI.2	R 336.1225
8. Trichloroethene	4.52 pph ¹	Hourly	FGEAST	SC V.1, V.2, VI.1, VI.2	R 336.1225
9. Tetrachloroethene	12.7 pph ¹	Hourly	FGEAST	SC V.1, V.2, VI.1, VI.2	R 336.1225
10. Hydrogen chloride	28.4 pph ¹	Hourly	FGEAST	SC V.1, VI.8	R 336.1225
11. PM	0.028 lb per 1,000 lbs of exhaust air ²	Hourly	FGEAST	SC V.4, VI.7, VI.9	R 336.1331(1)(c)
12. PM10	1.9 pph ¹	Hourly	FGEAST	SC V.4, VI.7, VI.10	R 336.1225
13. PM10	4.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGEAST	SC V.4, VI.7, VI.11	R 336.1205(3)

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
14. PM	0.028 lb per 1,000 lbs of exhaust air ²	Hourly	Each storage silo	SC V.4, VI.10, VI.12	R 336.1331(1)(c)
15. PM10	0.12 pph ¹	Hourly	Each storage silo	SC V.4, VI.11	R 336.1225

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC in waste	Maximum of 2% by weight for hazardous waste ²	Daily average for waste accepted for treatment	FGEAST	SC VI.3	R 336.1225 R 336.1702(a)
2. VOC in waste	Maximum of 20% by weight for nonhazardous waste ²	Daily average for waste accepted for treatment	FGEAST	SC VI.3	R 336.1225 R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall operate the FGEAST waste treatment process building in compliance with the air flows specified in the following table. For purposes of this condition, normal operation means any activities such as mixing or blending of wastes, loading or unloading of waste materials.² (**R 336.1225, R 336.1331, R 336.1702(a), 40 CFR Part 63, Subparts A and DD, 40 CFR 63.685(i)(1)**)

Parameter	CFM
minimum air flow rate	19,500
maximum air flow rate	26,400

- The permittee shall implement the “Preventive Maintenance and Malfunction Abatement Program, Air Pollution Control Systems.” This plan shall be made available to the Department upon request.² (**R 336.1225, R 336.1331, R 336.1702(a), R 336.1910**)
- The permittee shall submit, implement, and maintain, a preventive maintenance and malfunction abatement plan (MAP) as described in Rule 911(2), for FGEAST. The MAP shall, at a minimum, specify the following:
 - A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review

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and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1911, R 336.1912(6))**

4. The permittee shall not have more than one waste treatment process building overhead door open at a time.² **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall operate FGEAST with the baghouse, thermal oxidizer and caustic scrubber installed and operated properly.² **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.685(i)(2), 40 CFR 63.693(f)(1)(i))**
2. The permittee shall maintain a VOC capture efficiency of 100 percent, as determined in accordance with SC V.2, in the FGEAST exhaust system.² **(R 336.1225, R 336.1702(a), 40 CFR Part 63, Subparts A and DD, 40 CFR 63.685(i)(1))**
3. The permittee shall not operate FGEAST unless a minimum temperature of 1,500°F and a minimum retention time of 0.4 seconds in the thermal oxidizer is maintained.² **(R 336.1225, R 336.1702(a), R 336.1910, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.693(f)(1)(i))**
4. The permittee shall maintain a minimum destruction efficiency of 95 percent in the thermal oxidizer when processing VOC containing waste with a concentration of greater than 500 ppm.² **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.693(f)(1)(i))**
5. The permittee shall operate the baghouse, thermal oxidizer and caustic scrubber 24 hours a day and maintain negative static pressure in the waste treatment building (pugmill and waste treatment/holding tanks) at all times. The negative pressure in the waste treatment building shall be determined by using smoke tubes, or an alternative method as approved by the AQD, and by visual observation of the air movement and direction.² **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1910, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.685(i)(1))**
6. The permittee shall install, maintain and operate limit switches in all overhead doors, so as to restrict the maximum opening heights to 20 feet except as needed for vehicle or equipment ingress and egress.² **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1910)**
7. Sludge feed and storage tank No. 12 (EUSLUDGETANK12) shall be vented into the FGEAST waste treatment process building.² **(R 336.1225, R 336.1702(a), 40 CFR Part 63, Subparts A and DD, 40 CFR 63.685(i)(1))**

V. TESTING/SAMPLING

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

1. Verification of pollutant emission rates from FGEAST specified in SC I.1 through I.10 and the destruction efficiency of the thermal oxidizer by testing, at owner's expense, in accordance with Department requirements, will be required for operating approval. Verification of emission rates and efficiencies includes the submittal of a complete report of the test results. Stack testing procedures, operational parameters, and the location of stack testing ports must have prior approval by the AQD District Supervisor. The permittee shall conduct the verification tests at least once every five years for the pollutant emission rates specified in SC I.1 through I.10.² **(R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.694(l))**
2. Verification of the VOC capture efficiency of the exhaust system by testing, at owner's expense, in accordance with Department requirements, will be required for operating approval. The VOC capture efficiency of the exhaust system shall be determined in accordance with Procedure T, found in 40 CFR 52.741 Appendix B, or an alternative method as approved by the AQD, and by visual observation of the air movement and direction. Alternative testing procedures for VOC capture efficiency and associated operational parameters must have prior approval by the AQD District Supervisor. The permittee shall conduct the verification tests at least once every

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year.² (R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.685(i)(1))

3. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
VOC	40 CFR 52.741, Appendix B, Procedure T; 40 CFR Part 60, Appendix A
Hydrogen Chloride	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A

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

4. The permittee shall verify PM and PM10 emission rates from FGEAST specified in SC I.11 and I.12, and upon request from storage silos, by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10	40 CFR Part 51, Appendix M

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

5. Within 365 days of permit issuance, the permittee shall verify the PM and PM10 emission rates from FGEAST specified in SC I.11 and I.12, and at a minimum, every five years from the date of the last test, thereafter. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
6. The permittee shall verify the pollutant emission rates from FGEAST specified in SC I.1 through I.12 and the destruction efficiency of the thermal oxidizer, at a minimum, every five years from the date of the last test. The testing for PM and PM10 emission rates shall be completed at the next scheduled stack testing. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
7. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor the temperature of the thermal oxidizer in the combustion chamber downstream of the combustion zone on a continuous basis and shall record five minute block averages of the monitored temperature in a manner and with instrumentation acceptable to the AQD District Supervisor.² (R 336.1225, R 336.1702(a), R 336.1910, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.693(f)(3), 40 CFR 63.695(e))

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2. The permittee shall maintain a written log for maintenance of the thermal oxidizer. The written log shall indicate the following:² **(R 336.1225, R 336.1702(a), R 336.1910, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.695(e), 40 CFR 63.696(g), 40 CFR 63.696(h))**
 - a. Date, time and duration of thermal oxidizer downtime.
 - b. Date of and description of maintenance performed on the thermal oxidizer.
 - c. Date of and description of repairs performed on the thermal oxidizer.
3. The permittee shall keep, in a satisfactory manner acceptable to the AQD District Supervisor, a log of all air pollution control equipment malfunctions or failures including the time, duration, cause, and a description of the corrective procedures or operational changes taken in accordance with the MAP. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**
4. The permittee shall obtain from the waste generator, and record, the amount of VOC present in each waste stream before treatment on a daily basis. A monthly report shall summarize the amount of waste treated and the VOC concentration and the total VOC input in order to monitor the cumulative VOC emissions for the preceding 12 months.² **(R 336.1225, R 336.1702(a))**
5. The permittee shall record the volume of each waste stream treated each month.² **(R 336.1702(a))**
6. The permittee shall calculate and limit the VOC emissions from FGEAST according to the method outlined in Appendix 7-1 unless a replacement method acceptable to the AQD has been submitted and approved.² **(R 336.1225, R 336.1702(a))**
7. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop of the treatment building baghouse on a continuous basis and record five minute block averages of the monitored pressure drop. The permittee shall maintain the pressure drop of the treatment building baghouse between 1.5 inches of water and 8 inches of water.² **(R 336.1205(3), R 336.1225, R 336.1331, R 336.1702(a), R 336.1910)**
8. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the liquid flow rate of the caustic scrubber on a continuous basis and record five minute block averages of the monitored liquid flow rate. The permittee shall maintain the liquid flow rate of the caustic scrubber at 225 gallons per minute to 350 gallons per minute.² **(R 336.1225, R 336.1702(a), R 336.1910)**
9. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pH of the caustic scrubber on a continuous basis and record five minute block averages of the monitored pH. The permittee shall maintain the pH in the caustic scrubber at 7.3 or higher.² **(R 336.1225, R 336.1702(a), R 336.1910)**
10. The permittee shall maintain up to date calculations of the PM exhaust gas concentrations, in pounds per thousand pounds of exhaust gas, from FGEAST according to the method outlined in Appendix 7-1.² **(R 336.1331)**
11. The permittee shall maintain up to date calculations of the hourly PM10 emission rates from FGEAST according to the method outlined in Appendix 7-1.¹ **(R 336.1225)**
12. The permittee shall calculate the PM10 emission rate from the FGEAST equipment controlled by the baghouse, thermal oxidizer, and wet scrubber in series for each month and 12-month rolling time period as determined at the each of each calendar month, according to the method outlined in Appendix 7-1.² **(R 336.1205(3), R 336.1225, R 336.1331)**
13. The permittee shall conduct and record the results of a visible emission observation (described in Appendix 3-1) of the silo baghouse exhausts once per calendar month during a period when the silos are being filled. The frequency of observations may be changed with the written approval of the AQD District Supervisor.² **(R 336.1331)**

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14. The permittee may only increase the frequency of visible emission observations required in SC VI.13. The permittee shall keep, in a satisfactory manner, a log of all visible emission observations (described in Appendix 3-1) of the silo baghouse exhausts including the time, duration, and a description of any increases in monitoring frequency and the reason for the changes. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**
15. The permittee shall continuously measure the pressure drop and record every five minutes as an indicator of proper operation of the dust collector. The indicator range is between 1.5 inches to 8 inches of water column (WC). **(40 CFR 64.6(c)(1)(i) and (ii))**
16. The permittee shall continuously monitor combustion chamber temperature and record every five minutes as an indicator of proper operation of the RTO. The indicator range is a minimum of 1500°F. **(40 CFR 64.6(b)(1)(i) and (ii))**
17. The permittee shall continuously monitor the air flow through the FGEAST waste treatment process building. This shall be recorded on a data acquisition system or other method, but at a minimum recorded once per day. The indicator range is 19,500 to 26,400 CFM. **(40 CFR 64.3(a)(2))**
18. The pressure gauge shall continuously monitor the pressure drop across the baghouse. The averaging period is 5 minutes block average. The monitor shall be calibrated annually or according to manufacturer recommendations, whichever is more frequent. **(40 CFR 64.6(c)(1)(iii))**
19. The temperature monitor shall continuously monitor the combustion temperature of the thermal oxidizer. The averaging period is 5 minutes block average. The monitor shall be calibrated annually or according to manufacturer recommendations, whichever is more frequent. **(40 CFR 64.6(c)(1)(iii))**
20. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the air flow rate through the FGEAST waste treatment process building on a continuous basis and record the monitored air flow rate. **(R 336.1213(3))**
21. The air flow monitor shall continuously monitor air flow through the FGEAST waste treatment process building. The monitor shall be calibrated annually or according to manufacturer recommendations, whichever is more frequent. **(40 CFR 64.6(c)(1)(iii))**
22. An excursion is a departure from the indicator ranges of 1.5 inches to 8 inches of WC pressure drop based on a 5-minute block average for the baghouse, below a minimum combustion temperature of 1500°F based on a 5-minute block average for the RTO, or a departure from the indicator range of 19,500 to 26,400 CFM based on a daily block average specified for the air flow through the FGEAST waste treatment process building. **(40 CFR 64.6(c)(2))**
23. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). An excursion triggers an inspection and corrective action. **(40 CFR 64.7(d))**
24. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably

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preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

25. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
26. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

See Appendices 3-1 and 7-1

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit, on a quarterly basis, the monthly report summarizing the amount of waste treated and the VOC concentration and the total VOC input in order to monitor the cumulative VOC emissions for the preceding 12 months.² **(R 336.1225, R 336.1702(a))**
5. Each semiannual report of monitoring deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
6. Each semiannual report of monitoring deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**
7. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVTHERMAL	54 ¹	75 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

1. The emissions of asbestos, the filter fabric, the operation of the fabric filter baghouse dust collectors and the process and disposal of all asbestos containing waste shall comply with the specifications found in the NESHAP (National Emission Standards for Hazardous Air Pollutants) for Asbestos in 40 CFR Part 61, Subpart M.² **(40 CFR Part 61, Subpart M)**
2. The permittee shall comply with all applicable provisions of the National Emission Standards for Benzene Waste Operations as specified in 40 CFR Part 61, Subparts A and FF. **(40 CFR Part 61, Subparts A and FF)**
3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations as specified in 40 CFR Part 63, Subparts A and DD. **(40 CFR Part 63, Subparts A and DD)**
4. The permittee shall notify the appropriate AQD District Office for the need to modify the CAM plan if the approved monitoring is found to be inadequate and shall submit a proposed modification to the plan if appropriate. **(40 CFR 64.7(e))**
5. The permittee shall comply with all requirements of 40 CFR Part 64, Compliance Assurance Monitoring. **(40 CFR Part 64)**
6. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

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

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

**FGWEST
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

West side waste treatment process consisting of sludge tank 11, treatment reagent and waste silos 1, 2, and 3, and waste treatment tanks A, B, C, and D. Silos 1 through 3 are used to store reagent, including (but not limited to) fly ash, lime, and cement kiln dust. This process treats low VOC waste (average VOC content less than 500 ppm).

Emission Units: EUSILO1-3, EUSLUDGETANK11, EUSTORAGETANK2

POLLUTION CONTROL EQUIPMENT

Baghouse dust collector. Each treatment reagent and waste storage silo has its own baghouse.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	22.85 pph ²	Hourly	FGWEST	SC V.1, VI.6, VI.8	R 336.1225 R 336.1702(a)
2. VOC	40.2 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGWEST	SC V.1, VI.6, VI.7, VI.8	R 336.1702(a)
3. Methylene Chloride	14.92 pph ¹	Hourly	FGWEST	SC V.1, VI.6,	R 336.1225
4. Benzene	0.71 pph ¹	Hourly	FGWEST	SC V.1, VI.6,	R 336.1225
5. 1,1,2,2- Tetrachloroethane	0.16 pph ¹	Hourly	FGWEST	SC V.1, VI.6	R 336.1225
6. Carbon Tetrachloride	0.28 pph ¹	Hourly	FGWEST	SC V.1, VI.6	R 336.1225
7. Chloroform	3.02 pph ¹	Hourly	FGWEST	SC V.1, VI.6	R 336.1225
8. Trichloroethene	4.52 pph ¹	Hourly	FGWEST	SC V.1, VI.6	R 336.1225
9. Tetrachloroethylene	12.7 pph ¹	Hourly	FGWEST	SC V.1, VI.6	R 336.1225
10. PM	0.028 lb per 1,000 lbs of exhaust air ²	Hourly	FGWEST	SC V.3, V.4, VI.1, VI.2, VI.4, VI.5	R 336.1331(1)(c)
11. PM10	9.6 pph ¹	Hourly	FGWEST	SC V.3, V.4, VI.1, VI.2, VI.4, VI.5	R 336.1225
12. PM10	20 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGWEST	SC V.3, V.4, VI.1, VI.2, VI.4, VI.5	R 336.1205(3)
13. PM	0.028 lb per 1,000 lbs of exhaust air ²	Hourly	Each storage silo	SC V.4, VI.4, VI.12	R 336.1331(1)(c)
14. PM10	0.12 pph ¹	Hourly	Each storage silo	SC V.4, VI.4	R 336.1225

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC in waste	Maximum of 500 ppm ²	Monthly average	FGWEST	SC VI.5.b	R 336.1225 R 336.1702(a)
2. VOC in waste	Maximum of 0.5% by weight ²	Daily average for waste accepted for treatment	FGWEST	SC VI.5.c	R 336.1225 R 336.1702(a)
3. VOC	VOC evaporation rate from the waste treatment process shall not exceed 60% by weight. ²	At all times	FGWEST	SC V.1	R 336.1225 R 336.1702(a)
4. Volatile Organic HAP in waste	Less than 500 ppmw based on the HAP content of the off-site material stream at the point-of-delivery ²	Annual average per off-site material stream	FGWEST	SC VI.9, VI.10	40 CFR Part 63, Subparts A and DD, 40 CFR 63.683(b)(1)(iii)

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall maintain the air flow through FGWEST within the range specified in the following table during normal operation:² **(R 336.1201(1)(a), R 336.1225, R 336.1331, R 336.1702(a))**

Parameter	Limit (cfm)
minimum air flow rate	80,000
maximum air flow rate	110,000

For purposes of this condition, normal operation is defined as:

- material in any waste treatment/storage tank is uncovered or has been covered less than two hours;
 - any period when material is being placed in or removed from EUSLUDGETANK11;
 - any period when waste is being charged into or discharged from a waste treatment/storage tank, or has been within the last two hours.
- The permittee shall operate the baghouse dust collector 24 hours a day and maintain negative static pressure in the waste treatment building (waste treatment/holding tanks) at all times during normal operation, as defined above in SC III.1.² **(R 336.1225, R 336.1331, R 336.1910)**
 - The permittee shall maintain the pressure drop of the FGWEST baghouse dust collector between 1.5 and 8 inches of water column.² **(R 336.1205(3), R 336.1225, R 336.1331, R 336.1910)**
 - The permittee shall not have more than one waste treatment process building overhead door open at a time.² **(R 336.1225, R 336.1331, R 336.1910)**
 - The permittee shall not process waste streams subject to the control requirements in 40 CFR 61.342(c)(1) of the National Emission Standards for Benzene Waste Operations (40 CFR Part 61, Subpart FF) in FGWEST.² **(40 CFR Part 61, Subpart FF, 40 CFR 61.342)**

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6. The permittee shall not process waste streams containing the following compounds. The permittee may add new compounds to the following list with a notification to the AQD. The AQD may also amend the list.¹ **(R 336.1901)**

Benzylamine	Dimethylamine	Methylamine	Trimethylamine
2-Butanethiol	Butyric acid	Diethyl sulfide	Dimethyl sulfide
Diisobutyl ketone	Ethanethiol	Methanethiol	Tetramethylammonium chloride
Thioglycolic acid	Thionyl chloride	Thiram	Mercaptans

7. The permittee shall implement the “Preventive Maintenance and Malfunction Abatement Program, Air Pollution Control Systems.” This plan shall be made available to the Department upon request.² **(R 336.1225, R 336.1331, R 336.1910)**
8. The permittee shall submit, implement, and maintain, a preventive maintenance and malfunction abatement plan (MAP) as described in Rule 911(2), for FGWEST. The MAP shall, at a minimum, specify the following:
- a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1911, R 336.1912(6))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the air flow from FGWEST on a continuous basis and record five minute block averages of the monitored air flow.² **(R 336.1201(3))**
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop of the treatment building baghouse dust collector on a continuous basis and record five minute block averages of the monitored pressure drop.² **(R 336.1205(3),R 336.1225, R 336.1331, R 336.1910)**
- 3. The permittee shall install, maintain and operate limit switches in all overhead doors, so as to restrict the maximum operation opening heights to 20 feet except as needed for vehicle or equipment ingress and egress.² **(R 336.1225, R 336.1331, R 336.1910)**
- 4. Sludge feed and storage tank No. 11 (EUSLUDGETANK11) shall be vented into the FGWEST waste treatment process building.¹ **(R 336.1225)**
- 5. The permittee shall operate FGWEST with the baghouse installed and operated properly.² **(R 336.1225, R 336.1331, R 336.1702(a), R 336.1910)**

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V. TESTING/SAMPLING

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

1. The VOC evaporation rate from the waste treatment process may be established at 60% by weight pursuant to “Air/Superfund National Technical Guidance, Study Series, Emission Factors for Superfund Remediation Technologies,” EPA-450/1-901-001, March 1991, for calculation and compliance demonstration. The permittee may use site specific data, based on testing, with the approval of the AQD District Supervisor, to establish an alternate evaporation rate.² (R 336.1225, R 336.1702(a), R 336.1910)
2. The permittee shall screen each waste stream for the compounds listed in SC III.6, using a method acceptable to the AQD District Supervisor.¹ (R 336.1901)
3. Verification of the negative static pressure in the waste treatment building by testing, at owner's expense, in accordance with Department requirements, will be required for operating approval. The negative static pressure in the waste treatment building shall be determined by using smoke tubes, or an alternative method as approved by the AQD, and by visual observation of the air movement and direction. Alternative testing procedures and associated operational parameters must have prior approval by the AQD District Supervisor. The permittee shall conduct the verification tests at least once every year and shall notify the department prior to conducting the tests. Any request for a change in the testing frequency must be submitted to the AQD District Supervisor for review and approval.² (R 336.1225, R 336.1331, R 336.2001, R 336.2003)
4. The permittee shall verify PM and PM10 emission rates from in FGWEST specified in SC I.10 and I.11, and upon request for storage silos, by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10	40 CFR Part 51, Appendix M

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

5. Within 365 days of permit issuance, the permittee shall verify the PM and PM10 emission rates from FGWEST specified in SC I.10 and I.11, and at a minimum, every five years from the date of the last test, thereafter. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)
6. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. (R 336.1213(3))

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor the air flow from FGWEST on a continuous basis and record five minute block averages of the monitored air flow.² (R 336.1201(3))
2. The permittee shall monitor the pressure drop of the FGWEST baghouse dust collector on a continuous basis and record five minute block averages of the monitored pressure drop. The permittee shall record any pressure drop excursions from the range specified in special condition III.4.² (R 336.1205(3), R 336.1225, R 336.1331, R 336.1910)

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3. The permittee shall maintain a written log for activities conducted pursuant to the “Preventive Maintenance and Malfunction Abatement Program, Air Pollution Control Systems.” The written log shall indicate the following:² **(R 336.1225, R 336.1910)**
 - a. Date, time and duration of baghouse downtime.
 - b. Date and description of maintenance performed on the baghouse.
 - c. Date and description of repairs performed on the baghouse.
4. The permittee shall keep, in a satisfactory manner acceptable to the AQD District Supervisor, a log of all air pollution control equipment malfunctions or failures including the time, duration, cause, and a description of the corrective procedures or operational changes taken in accordance with the MAP. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**
5. On a monthly basis, the permittee shall maintain the following records for FGWEST:² **(R 336.1205(3), R 336.1225, R 336.1331)**
 - a. PM concentration in pounds per thousand pounds of exhaust gas according to the method outlined in Appendix 7-1.
 - b. Hourly PM10 emission rate according to the method outlined in Appendix 7-1.
 - c. Monthly and 12-month rolling total PM10 emissions according to the method outlined in Appendix 7-1.
6. The permittee shall maintain the following records for FGWEST:² **(R 336.1225, R 336.1702(a))**
 - a. The volume of each waste stream treated; monthly record.
 - b. VOC content in parts per million (ppm) and/or percent by weight present in each waste stream prior to treatment, based on generator information; daily record.
 - c. Average daily VOC content (% by weight) of waste streams; daily record.
 - d. Monthly and 12-month rolling total VOC emissions according to the method outlined in Appendix 7-1; monthly record.
7. The permittee shall calculate and record the VOC, PM and PM10 emissions from FGWEST according to the method outlined in Appendix 7-1 unless a replacement method acceptable to the AQD has been submitted and approved.² **(R 336.1205(3), R 336.1225, R 336.1331, R 336.1702(a))**
8. The permittee shall prepare a monthly report summarizing the amount and VOC concentration (in ppm) of each waste stream treated, and the total VOC input (in pounds) to FGWEST in order to monitor the cumulative VOC emissions for the preceding 12 months; monthly record.² **(R 336.1225, R 336.1702(a))**
9. The permittee shall perform an initial determination of the average Volatile Organic HAP (VOHAP) concentration for each off-site material stream using the procedures specified in 40 CFR 63.694(b) prior to the first time any portion of the off-site material stream is treated in FGWEST. Thereafter, the permittee shall review and update, as necessary, this determination at least once every 12 months following the date of the initial VOHAP determination.² **(40 CFR Part 63, Subpart DD, 40 CFR 63.696(a))**
10. The permittee shall keep, in a satisfactory manner, records of the VOHAP concentration of each off-site material stream, as defined in 40 CFR Part 63, Subpart DD, processed in FGWEST for each month and 12-month rolling time period.² **(40 CFR Part 63, Subpart DD, 40 CFR 63.696(a))**
11. The permittee shall maintain records for each waste stream treated in FGWEST sufficient to demonstrate that the waste was not subject to the control requirements of the National Emission Standards for Benzene Waste Operations, 40 CFR Part 61, Subpart FF.² **(40 CFR Part 61, Subpart FF, 40 CFR 61.342)**

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12. The permittee shall conduct and record the results of a visible emission observation (described in Appendix 3-1) of the silo baghouse exhausts once per calendar month during a period when the silos are being filled. The frequency of observations may be changed with the written approval of the AQD District Supervisor.² **(R 336.1331)**
13. The permittee may only increase the frequency of visible emission observations required in SC VI.12. The permittee shall keep, in a satisfactory manner, a log of all visible emission observations (described in Appendix 3-1) of the silo baghouse exhausts including the time, duration, and a description of any increases in monitoring frequency and the reason for the changes. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**
14. The permittee shall continuously measure the pressure drop and record every five minutes as an indicator of proper operation of the dust collector. The indicator range is 1.5" to 8.0" water column (WC). **(40 CFR 64.6(c)(1)(i) and (ii))**
15. The pressure gauge shall continuously monitor the pressure drop across the baghouse. The averaging period is five-minute block average. The monitor shall be calibrated annually or according to manufacturer recommendations whichever is more frequent. **(40 CFR 64.6(c)(1)(iii))**
16. An excursion is a departure from the indicator range of 1.5" to 8.0" WC based on a five-minute block average. **(40 CFR 64.6(c)(2))**
17. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). An excursion triggers an inspection and corrective action. **(40 CFR 64.7(d))**
18. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
19. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
20. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

See Appendix 7-1

VII. REPORTING

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

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2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The permittee shall submit, on a semiannual basis, the monthly report summarizing the amount of waste treated, the VOC concentration and the total VOC input in order to monitor the cumulative VOC emissions for the preceding 12 months.² **(R 336.1225, R 336.1702(a))**
6. Each semiannual report of monitoring deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
7. Each semiannual report of monitoring deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWEST	54 ¹	75 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Benzene Waste Operations as specified in 40 CFR Part 61, Subparts A and FF.² **(40 CFR Part 61, Subparts A and FF)**
2. The emissions of asbestos, the filter fabric, the operation of the fabric filter baghouse dust collectors and the process and disposal of all asbestos containing waste shall comply with the specifications found in the NESHAP (National Emission Standards for Hazardous Air Pollutants) for Asbestos in 40 CFR Part 61, Subpart M.² **(40 CFR Part 61, Subpart M)**
3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations as specified in 40 CFR Part 63, Subparts A and DD.² **(40 CFR Part 63, Subparts A and DD)**
4. The permittee shall notify the appropriate District Office of the AQD for the need to modify the CAM plan if the approved monitoring is found to be inadequate and shall submit a proposed modification to the plan if appropriate. **(40 CFR 64.7(e))**
5. The permittee shall comply with all requirements of 40 CFR Part 64, Compliance Assurance Monitoring. **(40 CFR Part 64)**

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6. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

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

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

**FGLIQWASTETKS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Four 20,000-gallon liquid waste holding tanks.

Emission Units: EULIQWASTETK16, EULIQWASTETK17, EULIQWASTETK18, EULIQWASTETK19

POLLUTION CONTROL EQUIPMENT

The conservation vents of the tanks are controlled by two common carbon adsorption canisters, in series.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.25 pph ²	Hourly	FGLIQWASTETKS	SC VI.1	R 336.1225 R 336.1702(a)
2. VOC	1.1 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGLIQWASTETKS	SC VI.1, VI.2	R 336.1702(a)
3. Halogenated VOC	323.55 mg per m ³ of exhaust air ¹	Hourly	FGLIQWASTETKS	SC VI.1	R 336.1225
4. Halogenated VOC	0.0162 pph ¹	Hourly	FGLIQWASTETKS	SC VI.1	R 336.1225
5. Halogenated VOC	3.6 lb/yr ¹	12-month rolling time period as determined at the end of each calendar month	FGLIQWASTETKS	SC VI.1, VI.2	R 336.1225

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Volatile Organic HAP in waste	Less than 500 ppmw based on the HAP content of the off-site material stream at the point-of- delivery ²	Annual average per off-site material stream	FGLIQWASTETKS	SC VI.3, VI.4	40 CFR Part 63, Subparts A and DD, 40 CFR 63.683(b)(1)(iii)

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Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
2. Waste stored	Store no waste subject to the control requirements of 40 CFR 61.342(c)(1) of the National Emission Standards for Benzene Waste Operations (40 CFR Part 61, Subpart FF) ²	Each waste stream	FGLIQWASTETKS	SC VI.5	40 CFR Part 61, Subparts A and FF, 40 CFR 61.342

3. The permittee shall not process waste streams containing the following compounds. The permittee may add new compounds to the list with a notification to the AQD. The AQD may also amend the list.¹ **(R 336.1901)**

Benzylamine	Dimethylamine	Methylamine	Trimethylamine
2-Butanethiol	Butyric acid	Diethyl sulfide	Dimethyl sulfide
Diisobutyl ketone	Ethanethiol	Methanethiol	Tetramethylammonium chloride
Thioglycolic acid	Thionyl chloride	Thiram	Mercaptans

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall submit, implement, and maintain, a preventive maintenance and malfunction abatement plan (MAP) as described in Rule 911(2), for FGLIQWASTETKS. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1911, R 336.1912(6))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall operate each FGLIQWASTETKS liquid waste storage tank with the carbon adsorption system that consists of two NIXTOX N100 (or equivalent) carbon adsorption canisters in series, installed and operating properly.² **(R 336.1225, R 336.1702(a), R 336.1910)**

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2. The permittee shall equip and maintain each carbon adsorption canister with a saturation indicator.² **(R 336.1225, R 336.1702(a))**
3. The permittee shall change the carbon adsorption canister within 48 hours of indication that the carbon bed is 70 percent expended.² **(R 336.1225, R 336.1702(a), R 336.1910)**
4. Each FGLIQWASTETKS liquid waste storage tank shall be sealed to prevent VOC emissions to the ambient air except through the carbon adsorption system.² **(R 336.1225, R 336.1702(a))**

V. TESTING/SAMPLING

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

1. The permittee shall screen each waste stream for the compounds listed in SC II.3, using a method acceptable to the AQD District Supervisor.¹ **(R 336.1901)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a written log for maintenance and replacement of the activated carbon from the carbon canisters. The written log shall indicate the following:² **(R 336.1225, R 336.1702(a), R 336.1910)**
 - a. Date the carbon canisters are monitored for saturation and the observed indicator tube saturation level.
 - b. Date when expended carbon in the canister is replaced with fresh activated carbon.
2. The permittee shall keep, in a satisfactory manner acceptable to the AQD District Supervisor, the observed indicator tube saturation level at a frequency specified in the MAP. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**
3. The permittee shall keep, in a satisfactory manner acceptable to the AQD District Supervisor, a log of all air pollution control equipment malfunctions or failures including the time, duration, cause, and a description of the corrective procedures or operational changes taken in accordance with the MAP. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**
4. The permittee shall calculate the VOC and halogenated VOC emission rates from FGLIQWASTETKS for each calendar month and 12-month rolling time period as determined at the end of each calendar month.² **(R 336.1225, R 336.1702(a))**
5. The permittee shall perform an initial determination of the average Volatile Organic HAP (VOHAP) concentration of each off-site material stream using the procedures specified in 40 CFR 63.694(b) before the first time any portion of the off-site material stream is placed in the unit. Thereafter, the permittee shall review and update, as necessary, this determination at least once every 12 months following the date of the initial determination for the off-site material stream.² **(40 CFR Part 63, Subparts A and DD, 40 CFR 63.696(a))**
6. The permittee shall keep, in a satisfactory manner, records of the VOHAP concentration of each off-site material stream, as defined in 40 CFR Part 63 Subpart DD, stored in FGLIQWASTETKS for each month and 12-month rolling time period.² **(40 CFR Part 63, Subparts A and DD, 40 CFR 63.696(a))**
7. The permittee shall analyze each waste stream before loading into any FGLIQWASTETKS tank to determine if it is a benzene containing waste subject to the National Emission Standards for Benzene Waste Operations, 40 CFR Part 61, Subpart FF.² **(40 CFR Part 61, Subparts A and FF, 40 CFR 61.342)**
8. For all storage vessels subject to 40 CFR Part 60, Subpart Kb records shall be kept of the operating plan and of the measured values of the parameters monitored in accordance with the plan.² **(40 CFR 60.115b(c))**
9. For all storage vessels subject to 40 CFR Part 60, Subpart Kb records shall be kept for the life of the source showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel.² **(40 CFR 60.116b(b))**

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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 8-1

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCARBONCAN	2 ¹	3 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the NSPS general provisions and storage tank regulations in 40 CFR Part 60, Subparts A, K, Ka, and Kb.² **(40 CFR Part 60, Subparts A, K, Ka, and Kb)**
2. The permittee shall comply with all applicable provisions of the National Emission Standards for Benzene Waste Operations as specified in 40 CFR Part 61, Subparts A and FF. **(40 CFR Part 61, Subparts A and FF)**
3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations as specified in 40 CFR Part 63, Subparts A and DD. **(40 CFR Part 63, Subparts A and DD)**

Footnotes:

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

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

**FGTMTFACILITY
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Waste treatment facility including all equipment in the east and west side processes, reagent silos, liquid waste storage tanks and the north container storage area.

Emission Units: EUSILO1-3, EUSILO4-6, EUSLUDGETANK12, EUSTORAGETANK1, EUSLUDGETANK11, EUSTORAGETANK2, EULIQWASTETK16, EULIQWASTETK17, EULIQWASTETK18, EULIQWASTETK19, EUDRUMSTORAGE

POLLUTION CONTROL EQUIPMENT

East side treatment process: Baghouse dust collector, thermal oxidizer, and wet scrubber in series.
 West side treatment process: Baghouse dust collector.
 Reagent silos: Each treatment reagent and waste silo has its own baghouse.
 Liquid waste storage tanks: The tanks are controlled by two shared carbon adsorption canisters in series.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Waste	576,000 gallons per day ²	Calendar day	FGTMTFACILITY	SC VI.1	R 336.1225 R 336.1702(a)
2. Waste	210.24 MM gallons per year ²	12 month rolling total as determined at the end of each calendar month	FGTMTFACILITY	SC VI.1	R 336.1702(a)
3. VOC in waste	1,584 tpy ²	12 month rolling total as determined at the end of each calendar month	FGTMTFACILITY	SC VI.1, VI.2	R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall wet and sweep all paved roads and parking lots with water at least once a day, weather permitting.² **(R 336.1301(1)(c))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall maintain compliance with the applicable general, off-site material treatment, tank, oil-water and organic-water separator, surface impoundment, container, transfer system, process vent, equipment leak, and closed vent system and control device standards detailed in 40 CFR 63.683, 40 CFR 63.684, 40 CFR 63.685, 40 CFR 63.686, 40 CFR 63.687, 40 CFR 63.688, 40 CFR 63.689, 40 CFR 63.690, 40 CFR 63.691, and 40 CFR 63.693.² **(40 CFR Part 63, Subparts A and DD, 40 CFR 63.683, 40 CFR 63.685, 40 CFR 63.688, 40 CFR 63.693)**

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- The permittee shall maintain compliance with the applicable general, tank, surface impoundment, container, individual drain system, oil-water separator, treatment process, closed vent system and control device standards detailed in 40 CFR 61.342, 40 CFR 61.343, 40 CFR 61.344, 40 CFR 61.345, 40 CFR 61.346, 40 CFR 61.347, 40 CFR 61.348, and 40 CFR 61.349.² **(40 CFR Part 61, Subparts A and FF, 40 CFR 61.342, 40 CFR 61.343, 40 CFR 61.349)**

V. TESTING/SAMPLING

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

- The permittee shall conduct applicable testing as required in 40 CFR 63.694.² **(40 CFR Part 63, Subparts A and DD, 40 CFR 63.694(b))**
- The permittee shall conduct applicable testing as required in 40 CFR 61.355.² **(40 CFR Part 61, Subparts A and FF, 40 CFR 61.355(b)(3))**

VI. MONITORING/RECORDKEEPING

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

- The permittee shall maintain a daily, monthly, and 12-month rolling time period, as determined at the end of each calendar month, record of the type (hazardous and nonhazardous) and amount of waste processed and the VOC concentrations of the wastes.² **(R 336.1225, R 336.1702(a))**
- The permittee shall calculate the total VOC in all waste treated each month and 12-month rolling time period, as determined at the end of each calendar month, according to the follow formula:² **(R 336.1702(a))**

$$\text{VOC}_t = \left[\left[\sum \{ (\text{gallons waste})_i \times (\text{weight fraction VOC})_i \times \text{density lbs/gal} \} + \right. \right. \\ \left. \left. \sum \{ (\text{cubic yards waste})_i \times (\text{weight fraction VOC})_i \times \text{density lbs/cubic yards} \} \right] \times 1\text{ton}/2,000 \text{ lbs} \right]$$

- A written daily log of the wetting or sweeping of all paved roads and parking lots shall be kept on file.² **(R 336.1301(1)(c))**
- The permittee shall comply with the applicable inspection and monitoring procedures detailed in 40 CFR 63.695.² **(40 CFR Part 63, Subparts A and DD, 40 CFR 63.695)**
- The permittee shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart A that are referenced in Table 2 of 40 CFR Part 63, Subpart DD as well as those detailed in 40 CFR 63.696.² **(40 CFR Part 63, Subparts A and DD, 40 CFR 63.696)**
- The permittee shall comply with the applicable monitoring procedures detailed in 40 CFR 61.354.² **(40 CFR Part 61, Subparts A and FF, 40 CFR 61.354)**
- The permittee shall comply with the applicable recordkeeping requirements of 40 CFR Part 61, Subpart A as well as those detailed in 40 CFR 61.356.² **(40 CFR Part 61, Subparts A and FF, 40 CFR 61.356)**

VII. REPORTING

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

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4. The permittee shall submit reports as required in 40 CFR 61.357 and 40 CFR 63.697.² **(40 CFR Part 61, Subparts A and FF, 40 CFR 61.357, 40 CFR Part 63, Subparts A and DD, 40 CFR 63.697)**

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the NESHAP (National Emission Standards for Hazardous Air Pollutants) for Off-Site Waste Recovery Operations in Subpart DD.² **(40 CFR Part 63, Subpart DD)**
2. The permittee shall comply with all applicable requirements of the National Emission Standards for Benzene Waste Operations.² **(40 CFR Part 61, Subparts A and FF)**

Footnotes:

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

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

**FGMACTDD
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

The provisions of 40 CFR Part 63, Subpart DD apply to a plant site for which both of the following are applicable:

- One or more operations receive off-site materials as specified in 40 CFR 63.680(b) and the operation is one of the waste management operations or recovery operations as specified in 40 CFR 63.680(a)(2)(i) through (vi).
- For each operation specified in 40 CFR 63.680(a)(2)(i) through (vi), the affected source is the entire group of off-site material management units (MMU) associated with the operation. An off-site MMU is a tank, container, surface impoundment, oil-water separator, organic-water separator, or transfer system used to manage off-site material as defined in 40 CFR 63.680(c)(1).

The provisions in this flexible group apply to closed-vent systems and control devices used to control air emissions.

Emission Units: EU SLUDGETANK12, EU STORAGE TANK1, EU SLUDGETANK11, EU STORAGE TANK2, EU LIQWASTETK16, EU LIQWASTETK17, EU LIQWASTETK18, EU LIQWASTETK19, EU LIQWASTETK21, EU LIQWASTETK25, EU LIQWASTETK27, EU DRUM STORAGE, EU SILO1-3, EU SILO4-6

POLLUTION CONTROL EQUIPMENT

East Bay (FGEAST) - baghouse dust collector, vapor incinerator (thermal oxidizer), and a caustic wet scrubber in series.

West Bay (FGWEST) - baghouse dust collector

Conservation vents on liquid waste holding tanks (EULIQWASTETK16, EULIQWASTETK17, EULIQWASTETK18, EULIQWASTETK19) are controlled by two common carbon adsorption canisters, in series.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total organic carbon (TOC), less methane and ethane	Less than or equal to 20 ppmv on a dry basis corrected to 3% O ₂ - OR - 95% or more reduction of TOC on a weight-basis	Hourly	EU SLUDGETANK12, EU STORAGE TANK1 venting to a common control device including a vapor incinerator (thermal oxidizer)	SC V.3	40 CFR 63.693(f)(1)(i)

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment ^A	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Off-site waste material at the point-of-delivery	Volatile organic hazardous air pollutant (VOHAP) concentration less than 500 ppmw	Annual average of the off-site material stream	EUSLUDGETANK11, EUSTORAGETANK2, EULIQWASTETK16, EULIQWASTETK17, EULIQWASTETK18, EULIQWASTETK19, EULIQWASTETK21, EULIQWASTETK25, EULIQWASTETK27, EUSILO1-3, EUSILO4-6	SC V.1, SC VI.1	40 CFR 63.683(b)(1)(iii)

^A When tanks or silos contain waste subject to 40 CFR Part 63, Subpart DD.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.683(e))**
2. The permittee must inspect and monitor each closed-vent system in accordance with the requirements specified in 40 CFR 63.695(c). **(40 CFR 63.693(b)(4)(i))**
 - a. The closed-vent system shall be visually inspected to check for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in ductwork or piping; loose connections; or broken or missing caps or other closure devices. **(40 CFR 63.695(c)(2)(i))**
 - b. The permittee must perform the inspections at least once every calendar year except as provided for in 40 CFR 63.695(f). **(40 CFR 63.695(c)(2)(ii))**
 - c. In the event that a defect or leak is detected, the permittee shall repair the defect or leak in accordance with the requirements of 40 CFR 63.695(c)(3). **(40 CFR 63.695(c)(2)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. For each closed-vent system and control device used to comply, the permittee shall meet the following requirements: **(40 CFR 63.693(b))**
 - a. The vent stream required to be controlled shall be conveyed to the control device by either of the following closed-vent systems:
 - i. A closed-vent system that is designed to operate with no detectable organic emissions using the procedure specified in 40 CFR 63.694(k); or **(40 CFR 63.693(c)(1)(i))**
 - ii. A closed-vent system that is designed to operate at a pressure below atmospheric pressure. The system shall be equipped with at least one pressure gauge or other pressure measurement device that can be read from a readily accessible location to verify that negative pressure is being maintained in the closed-vent system when the control device is operating. **(40 CFR 63.693(c)(1)(ii))**

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- b. A vapor incinerator (thermal oxidizer) must achieve the performance specifications in SC I.1. **(40 CFR 63.693(f)(1)(i))**
2. The permittee who elects to control air emissions by using an enclosure vented through a closed-vent system to an enclosed combustion control device shall meet the requirements specified as follows: **(40 CFR 63.685(i))**
 - a. The tank shall be located inside an enclosure. The enclosure shall be designed and operated in accordance with the criteria for a permanent total enclosure as specified in “Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure” under 40 CFR 52.741, Appendix B. The enclosure may have permanent or temporary openings to allow worker access; passage of material into or out of the enclosure by conveyor, vehicles, or other mechanical means; entry of permanent mechanical or electrical equipment; or to direct airflow into the enclosure. The permittee shall perform the verification procedure for the enclosure as specified in Section 5.0 to “Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure” initially when the enclosure is first installed and, thereafter, annually. **(40 CFR 63.685(i)(1))**
 - b. The enclosure shall be vented through a closed-vent system to an enclosed combustion control device that is designed and operated in accordance with the standards for either a vapor incinerator, boiler, or process heater specified in 40 CFR 63.693. **(40 CFR 63.685(i)(2))**
3. The permittee shall control air emissions from each container in accordance with the following requirements, as applicable to the container: **(40 CFR 63.688(b))**
 - a. The permittee controls air emissions from the container in accordance with the standards for Container Level 1 controls as specified in 40 CFR Part 63, Subpart PP-National Emission Standards for Containers, except that 40 CFR 63.922(d)(4) and (5) and 40 CFR 63.923(d)(4) and (5) shall not apply for the purposes of this subpart. **(40 CFR 63.688(b)(1)(i), 40 CFR 63.688(b)(2))**
 - b. As an alternative to meeting the requirements in SC IV.3.a, the permittee may choose to control air emissions from the container in accordance with the standards for either Container Level 2 controls or Container Level 3 controls as specified in 40 CFR Part 63, Subpart PP-National Emission Standards for Containers, except that 40 CFR 63.922(d)(4) and (5) and 40 CFR 63.923(d)(4) and (5) shall not apply for the purposes of this subpart. **(40 CFR 63.688(b)(1)(ii), 40 CFR 63.688(b)(2))**
4. The permittee must monitor the operation of the vapor incinerator (thermal oxidizer) using a continuous parameter monitoring system to measure and record the daily average temperature of the exhaust gases from the control device. The accuracy of the temperature monitoring device must be ± 1 percent of the temperature being measured, expressed in degrees Celsius of ± 0.5 °C, whichever is greater. **(40 CFR 63.693(f)(3)(i))**
 - a. The continuous parameter monitoring system must measure either an instantaneous value at least once every 15 minutes or an average value for intervals of 15 minutes or less and continuously record either: **(40 CFR 63.695(e)(1)(i))**
 - i. Each measured data value; or **(40 CFR 63.695(e)(1)(i)(A))**
 - ii. Each block average value for each 1-hour period or shorter periods calculated from all measured data values during each period. If values are measured more frequently than once per minute, a single value for each minute may be used to calculate the hourly (or shorter period) block average instead of all measured values. **(40 CFR 63.695(e)(1)(i)(B))**
 - b. The monitoring system must be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications or other written procedures that provide reasonable assurance that the monitoring equipment is operating properly. **(40 CFR 63.695(e)(1)(ii))**

V. TESTING/SAMPLING

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

1. The average VOHAP concentration for off-site material streams at the point-of-delivery shall be determined using either direct measurement as specified in 40 CFR 63.694(b)(2) or by knowledge as specified in 40 CFR 63.694(b)(3). **(40 CFR 63.694(a)(1))**

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2. The permittee shall verify TOC emission rates or the control device percent reduction by testing at owner's expense, in accordance with the Department requirements. Testing shall be performed in accordance with 40 CFR 63.694(l) control device performance test procedures. Performance tests shall be based on representative performance (*i.e.*, performance based on normal operating conditions) and shall exclude periods of startup and shutdown. The permittee must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. This report must also verify that the operating limits for the control device have not changed or provide documentation of revised operating limits established during the performance test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004, 40 CFR 63.694(l))**
3. The permittee shall verify the TOC emission rates or the control device percent reduction, at a minimum, every five years from the date of the last test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3), 40 CFR 63.697(b)(1))**

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, in a satisfactory manner, records of the VOHAP concentration of each off-site material stream processed using the procedures specified in 40 CFR 63.694(b), as required by SC V.1. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3), 40 CFR 63.696(a))**
2. The permittee shall keep the following records:
 - a. Records required by Table 2 of 40 CFR Part 63, Subpart DD. **(40 CFR 63.696(a))**
 - b. Records for control devices in accordance with the requirements of 40 CFR 63.10. **(40 CFR 63.696(b))**
 - c. Each permittee using an enclosure to comply with the tank control requirements specified in SC IV.2 prepare and maintain records for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure as specified in "Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741, Appendix B. **(40 CFR 63.696(f))**
 - d. Semiannual records for those planned routine maintenance operations that would require the control device not to meet the requirements of SC IV.1.b, as applicable. **(40 CFR 63.696(g))**
 - i. A description of the planned routine maintenance that is anticipated to be performed for the control device during the next 6 months. This description shall include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods. **(40 CFR 63.696(g)(1))**
 - ii. A description of the planned routine maintenance that was performed for the control device during the previous 6 months. This description shall include the type of maintenance performed and the total number of hours during these 6 months that the control device did not meet the requirement of SC IV.1.b, as applicable, due to planned routine maintenance. **(40 CFR 63.696(g)(2))**
 - e. Records of the malfunction information as specified: **(40 CFR 63.696(h))**
 - i. In the event that an affected unit fails to meet an applicable standard, record the number of failures. For each failure, record the date, time and duration of the failure. **(40 CFR 63.696(h)(1))**
 - ii. For each failure to meet an applicable standard, record and retain a list of the equipment, an estimate of the volume of each regulated pollutant emitted over any emission limit and a description of the method used to estimate the emissions. **(40 CFR 63.696(h)(2))**

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- iii. Record actions taken to minimize emissions and any corrective actions taken to return the affected unit to its normal or usual manner of operation. **(40 CFR 63.696(h)(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee must submit the following notifications and reports:
 - a. Notices and reports pursuant to 40 CFR 63.9 and 40 CFR 63.10, as specified in Table 2 of 40 CFR Part 63, Subpart DD. **(40 CFR 63.697(a))**
 - b. Reports for control devices used to meet the requirements of 40 CFR 63.693 as follows: **(40 CFR 63.697(b))**
 - i. Performance test reports specified in SC V.2. **(40 CFR 63.697(b)(2))**
 - ii. **Reports of malfunctions.** If a source fails to meet an applicable standard, report such events in the Periodic Report. Report the number of failures to meet an applicable standard. For each instance, report the date, time and duration of each failure. For each failure, the report must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions. **(40 CFR 63.697(b)(3))**
 - iii. **A semiannual summary report.** The summary report must include a description of all deviations as defined in 40 CFR 63.683(f) and 40 CFR 63.695(e) that have occurred during the 6-month reporting period. For each deviation caused when the daily average value of a monitored operating parameter is less than the minimum operating parameter limit (or, if applicable, greater than the maximum operating parameter limit), the report must include the daily average values of the monitored parameter, the applicable operating parameter limit, and the date and duration of the period that the deviation occurred. For each deviation caused by lack of monitoring data, the report must include the date and duration of period when the monitoring data were not collected and the reason why the data were not collected. **(40 CFR 63.697(b)(4))**
5. Within 60 days after the date of completing each performance test (as defined in 40 CFR 63.2), the permittee must submit the results of the performance test according to the manner specified as follows: **(40 CFR 63.697(a)(3))**
 - a. For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>), the permittee must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) accessed through the EPA's Central Data Exchange (CDX) (<http://cdx.epa.gov>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT. Owners or operators who claim that some of the performance test information being submitted is confidential business information (CBI) must submit a complete file generated through the use of the EPA's ERT, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Road, Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier. **(40 CFR 63.697(a)(3)(i))**
 - b. For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site, the permittee must submit the results of the performance test to the EPA at the appropriate address listed in 40 CFR 60.4. **(40 CFR 63.697(a)(3)(ii))**

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6. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, as specified in 40 CFR Part 63, Subpart A and Subpart DD. **(40 CFR Part 63, Subparts A and DD)**

**FGCOLDCLEANERS
FLEXIBLE GROUP CONDITIONS****DESCRIPTION**

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

Emission Unit: EUCOLDCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. REPORTING

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

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See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1-1. Acronyms and Abbreviations

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

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

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Appendix 2-1. Schedule of Compliance

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

Appendix 3-1. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FGEAST, SC VI.12 and FGWEST, SC VI.12. Alternative monitoring procedures, methods, or specifications must be approved by the AQD District Supervisor.

A “visible emissions observation” refers to a survey to be performed for the purpose of determining the presence or absence of visible emissions, other than uncombined water vapor. Visible emission observations shall be taken at least once per month, or on an alternate frequency as approved in writing by the AQD District Supervisor, for a duration of one (1) minute, during daylight hours while each silo is being filled (for a possible total of six (6) readings). This can be performed by either a certified or non-certified reader. A record of the required observations shall contain the following information: date, time, name and location of the observer, identity of the silo being observed and documentation of the presence or absence of visible emissions (Yes/No) for each reading.

Upon determination that visible emissions are occurring, the following procedure shall be followed:

1. Cease the filling of the affected silo immediately
2. Conduct necessary repair/maintenance on the baghouse
3. Resume filling and conduct a follow-up non-certified reading

If available, a Method 9 certified reader may conduct an opacity observation and determine the six-minute average opacity. If the opacity is below 20% (or 27% for one six-minute average per hour), then the operation may continue without corrective actions. However, corrective actions shall be completed prior to the next delivery.

Appendix 4-1. Recordkeeping

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

Appendix 5-1. Testing Procedures

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

Appendix 6-1. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-M4782-2010. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

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Source-Wide PTI No MI-PTI-M4782-2010b is being reissued as Source-Wide PTI No. MI-PTI-M4782-2024.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
107-14	NA	Revised benzene waste NESHAP (40 CFR Part 63, Subpart DD) language error.	EUSLUDGETANK11 EUSTORAGETANK2 (FGWEST)

Appendix 7-1. Emission Calculations

A. PROCEDURE TO DETERMINE VOC EMISSIONS FROM TREATMENT PROCESSES

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FGEAST and FGWEST. The following formula shall be used to calculate and monitor the VOC emissions from each waste treatment process, based on a 12-month rolling time period, as determined at the end of each calendar month:

$$VOC_e = \sum [V_i \times W_i \times D_i] \times Er \times [1-A_e]$$

Where:

- VOC_e = Cumulative VOC emissions from the control unit during the period
- i = Each iteration of waste stream treated during the time period
- V_i = Volume of waste stream i processed
- W_i = Weight fraction of VOC present in waste stream i processed
- D_i = Density of waste stream i processed in appropriate unit; assumed to average 8.5 lbs/gal
- Er = Emission factor for VOC released from waste during treatment process and delivered to the control device (100% VOC capture efficiency). Pursuant to “Air/Superfund National Technical Guidance, Study Series, Emission Factors for Superfund Remediation Technologies,” EPA-450/1-901-001, March 1991, the permittee may use a factor of 60% evaporation by weight for calculation and compliance demonstration. However, the permittee may use site specific data, based on testing, with the approval of the AQD District Supervisor, to establish an alternate evaporation rate.
- A_e = Control efficiency
 - = 0 for FGWEST (no VOC control)
 - = 0.95 for FGEAST (control efficiency of thermal oxidizer unit is 95%)

The permittee shall use the VOC emission factor, VOC capture efficiency and the control device control efficiency cited above until these parameters are determined by testing. Upon approval by the AQD, permittee shall use the test results for these parameters for VOC emission calculations unless a new determination by the permittee is approved by the AQD.

B. PROCEDURE TO DETERMINE PM AND PM10 EMISSIONS FROM TREATMENT PROCESSES AND STORAGE SILOS

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

The following formula shall be used to calculate and monitor the PM10 emissions from each waste treatment process and Storage Silo:

$$PM \text{ (lbs/1000 lbs exhaust air)} = C_{inlet} \times [1\text{lb}/7000 \text{ gr}] \times [1-A_e] \times [1/D_{air}] \times [1000]$$

$$PM10_e \text{ (lb/hr)} = C_{inlet} \times [1 \text{ lb}/7000 \text{ gr}] \times [1-A_e] \times V \times [60 \text{ min}/1 \text{ hr}]$$

$$PM10_e \text{ (tpy)} = C_{inlet} \times [1 \text{ lb}/7000 \text{ gr}] \times [1-A_e] \times V \times [525,600 \text{ min}/1 \text{ yr}] \times [1 \text{ ton}/2000 \text{ lbs}]$$

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Where:

- PM = PM emissions;
- PM_{10e} = Cumulative PM10 emissions;
- C_{inlet} = Design inlet loading from baghouse manufacturer = 0.5 gr/cf for FGEAST , FGWEST and Silos
- D_{air} = Density of air at actual conditions = 0.075 lb/ft³
- A_e = Minimum Baghouse Control Efficiency = 99.5% (to be conservative)
- V = Exhaust air flow = 26,400 cfm for FGEAST ; 110,000 for FGWEST; Pneumatic pump flow rate for the Silos is 900 cfm;

Appendix 8-1. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

The permittee shall use the EGLE Report Certification form (EQP 5736) when submitting any other reports related to facility compliance including, but not limited to, annual Michigan Air Emissions Reporting System (MAERS) submittals, reports submitted pursuant to Rule 912, and stack testing. 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.
(R 336.1213(3))

Section 2 – Wayne Disposal, Inc.

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Section 2 – Wayne Disposal, Inc.

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

Section 2 – Wayne Disposal, Inc.

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

Equipment & Design

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

Emission Limits

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

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

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

Testing/Sampling

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

Section 2 – Wayne Disposal, Inc.

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Monitoring/Recordkeeping

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

Certification & Reporting

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

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

Permit Shield

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

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

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

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

Revisions

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

Reopenings

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

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Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

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Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

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C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUASBESTOS	This facility (including landfilling) is actively accepting or has accepted asbestos waste in the past.	10-01-1974	NA
EUCUMMINS1979	450 HP Emergency Diesel Reciprocating Internal Combustion Engine (RICE), Model year 1979, subject to 40 CFR Part 63, Subpart ZZZZ.	04-01-2010	FGEMERGENCYENGINE

**EUASBESTOS
EMISSION UNIT CONDITIONS**

DESCRIPTION

This facility (including landfilling) is actively accepting or has accepted asbestos waste in the past.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. If the landfill accepts asbestos-containing waste materials from a source covered under 40 CFR 61.149, 40 CFR 61.150, or 40 CFR 61.155, the permittee shall meet the following operational requirements: **(40 CFR 61.154)**
 - a. Either there must be no visible emissions to the outside air from any active waste disposal site where asbestos-containing waste material has been deposited, or the requirements of 40 CFR 61.154(c) or (d) must be met. **(40 CFR 61.154(a))**
 - b. Unless a natural barrier adequately deters access by the general public, either warning signs and fencing must be installed and maintained as follows, or the requirements of 40 CFR 61.154(c)(1) must be met. **(40 CFR 61.154(b))**
 - i. Warning signs must be displayed at all entrances and at intervals of 100 m (330 ft) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material is deposited. **(40 CFR 61.154(b)(1))** The warning signs must:
 - (1) Be posted in such a manner and location that a person can easily read the legend. **(40 CFR 61.154(b)(1)(i))**
 - (2) Conform to the requirements of 51 cm by 36 cm (20 inches by 14 inches) upright format signs specified in 29 CFR 1910.145(d)(4) and 40 CFR 61.154(b)(1). **(40 CFR 61.154(b)(1)(ii))**
 - (3) The permittee shall display the legend in the lower panel with letter sizes and styles of a visibility at least equal to those specified in 40 CFR 61.154(b)(1). Spacing between any two lines must be at least equal to the height of the upper of the two lines. **(40 CFR 61.154(b)(1)(iii))**
 - ii. The perimeter of the disposal site must be fenced in a manner adequate to deter access by the general public. **(40 CFR 61.154(b)(2))**
 - iii. Upon request and supply of appropriate information, the appropriate AQD District Supervisor will determine whether a fence or a natural barrier adequately deters access by the general public. **(40 CFR 61.154(b)(3))**

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- c. Rather than meet the no visible emission requirement of 40 CFR 61.154(a), at the end of each operating day, or at least once every 24-hour period while the site is in continuous operation, the asbestos-containing waste material that has been deposited at the site during the operating day or previous 24-hour period shall: **(40 CFR 61.154(c))**
 - i. Be covered with at least 15 centimeters (6 inches) of compacted non-asbestos-containing material. **(40 CFR 61.154(c)(1))** or
 - ii. Be covered with a resinous or petroleum-based dust suppression agent that effectively binds dust and controls wind erosion. Such an agent shall be used in the manner and frequency recommended for the particular dust by the dust suppression agent manufacturer to achieve and maintain dust control. Other equally effective dust suppression agents may be used upon prior approval by the appropriate AQD District Supervisor. For purposes of 40 CFR 61.154(c)(2), any used, spent, or other waste oil is not considered a dust suppression agent. **(40 CFR 61.154(c)(2))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. Any segregated area of asbestos or non-degradable material may be excluded from collection if documented as provided under 40 CFR 63.1983(d). The documentation must provide the nature, date of deposition, location and amount of asbestos or non-degradable material deposited in the area and shall be provided to the AQD upon request. **(40 CFR 63.1962(a)(3)(i))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For all asbestos-containing waste material received, the permittee of the active waste disposal site shall:
 - a. Maintain waste shipment records that include the following information: **(40 CFR 61.154(e)(1))**
 - i. The name, address, and telephone number of the waste generator. **(40 CFR 61.154(e)(1)(i))**
 - ii. The name, address, and telephone number of the transporter(s). **(40 CFR 61.154(e)(1)(ii))**
 - iii. The quantity of the asbestos-containing waste material in cubic meters (cubic yards). **(40 CFR 61.154(e)(1)(iii))**
 - iv. The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers. Report in writing to the local, State, or USEPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the local, State, or USEPA Regional office responsible for administering the asbestos NESHAP program for the disposal site, by the following working day, the presence of a significant amount of improperly enclosed or uncovered waste. Submit a copy of the waste shipment record along with the report. **(40 CFR 61.154(e)(1)(iv))**
 - v. The date of the receipt. **(40 CFR 61.154(e)(1)(v))**
 - b. As soon as possible and no longer than 30 days after receipt of the waste, send a copy of the signed waste shipment record to the waste generator. **(40 CFR 61.154(e)(2))**
 - c. Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the local, State, or USEPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and if different, the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report. **(40 CFR 61.154(e)(3))**

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2. The permittee shall maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area storage. **(40 CFR 61.154(f))**
3. The permittee must keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or non-degradable waste excluded from collection as provided in 40 CFR 63.1962(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in 40 CFR 63.1962(a)(3)(ii). **(40 CFR 63.1983(d)(2))**
4. The permittee shall keep records of one the following regarding any active disposal site where asbestos containing materials have been deposited:
 - a. USEPA Testing Method 22 readings demonstrating no visible emissions from any active disposal site where asbestos containing materials have been deposited. These readings are to be taken for 15 minutes each operating day. **(R 336.1213(3))**
 - b. Records of the date asbestos waste is received, the amount and type of material that has been used to cover the asbestos waste, and documentation that the cover material was applied in the frequency required in SC III.1.c of this table. **(40 CFR 61.154(c))**
 - c. Records pursuant to an alternative emissions control method that has prior written approval of the AQD District Supervisor as noted in SC III.1.d of this table. **(40 CFR 61.154(d))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit to the appropriate AQD District Supervisor, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities. **(40 CFR 61.154(h))**
5. The permittee shall furnish upon request and make available during normal business hours for inspection by the AQD, all records required by 40 CFR Part 61. **(40 CFR 61.154(i))**
6. Notify the AQD Technical Programs Unit and the appropriate AQD District Office in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the appropriate AQD District Office at least 10 working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. **(40 CFR 61.154(j))**

Include the following information in the notice:

- a. Scheduled starting and completion dates. **(40 CFR 61.154(j)(1))**
- b. Reason for disturbing the waste. **(40 CFR 61.154(j)(2))**
- c. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the AQD or may require changes in the emission control procedures to be used. **(40 CFR 61.154(j)(3))**
- d. Location of any temporary storage site and the final disposal site. **(40 CFR 61.154(j)(4))**

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See Appendix 8-2

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee must comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants for Asbestos as specified in 40 CFR Part 61, Subparts A and M. **(40 CFR Part 61, Subparts A and M)**
2. The permittee must comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as specified in 40 CFR Part 63, Subparts A and AAAA. **(40 CFR Part 63, Subparts A and AAAA)**

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D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGEMERGENCYENGINE	40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition (CI) RICE equal to or less than 500 brake hp. A RICE is existing if the date of construction is before June 12, 2006.	EUCUMMINS1979

**FGEMERGENCYENGINE
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition (CI) RICE equal to or less than 500 brake hp. A RICE is existing if the date of construction is before June 12, 2006.

Emission Unit: EUCUMMINS1979

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must comply with the requirements in Item 1 of Table 2c of 40 CFR Part 63, Subpart ZZZZ which apply to each engine in FGEMERGENCYENGINE as specified in the following:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c.1)**

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC III.1. **(40 CFR 63.6625(i))**

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3. The permittee shall operate and maintain each engine in FGEMERGENCYENGINE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6605, 40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6.9)**
4. For each engine in FGEMERGENCYENGINE, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**
5. The permittee may operate each engine in FGEMERGENCYENGINE for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2))**
6. Each engine in FGEMERGENCYENGINE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in **SC III.5**. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each engine in FGEMERGENCYENGINE with non-resettable hours meters to track the operating hours. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

1. If using the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. **(40 CFR 63.6625(i))**

VI. MONITORING/RECORDKEEPING

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

1. For each engine in FGEMERGENCYENGINE, the permittee shall keep in a satisfactory manner the following:
 - a. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted,

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- b. Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment,
- c. Records of performance tests and performance evaluations,
- d. Records of all required maintenance performed on the air pollution control and monitoring equipment,
- e. Records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a), 40 CFR 63.6660)**

2. For each engine in FGEMERGENCYENGINE, the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow a maintenance plan that provides to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660, 40 CFR Part 63, Subpart ZZZZ, Table 6.9)**
3. For each engine in FGEMERGENCYENGINE, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
4. The permittee shall monitor and record, the total hours of operation for each engine in FGEMERGENCYENGINE on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGEMERGENCYENGINE on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. The permittee shall keep all records on file and make them available to the department upon request. **(R 336.1213(3), 40 CFR 63.6655(f), 40 CFR 63.6660)**
5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for diesel fuel oil used in FGEMERGENCYENGINE. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. **(R 336.1213(3))**
6. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). **(40 CFR 63.6660(a))**
7. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.6660(b))**

VII. REPORTING

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

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See Appendix 8-2

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ for Stationary Reciprocating Internal Combustion Engines. **(40 CFR Part 63, Subparts A and ZZZZ)**

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1-2. Acronyms and Abbreviations

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

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

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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 3-2. Monitoring Requirements

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

Appendix 4-2. Recordkeeping

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

Appendix 5-2. Testing Procedures

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

Appendix 6-2. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-M4782-2010. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-M4782-2010b is being reissued as Source-Wide PTI No. MI-PTI-M4782-2024.

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

Appendix 7-2. 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.

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Appendix 8-2. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

The permittee shall use the EGLE Report Certification form (EQP 5736) when submitting any other reports related to facility compliance including, but not limited to, annual Michigan Air Emissions Reporting System (MAERS) submittals, reports submitted pursuant to Rule 912, and stack testing. 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.
(R 336.1213(3))