App No. 202400088

EGLE

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division

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

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

1. SRN N2079	2. ROP Number MI-ROP-N2079-2017	3. County Kent
4. Stationary Source Name	Lacks Enterprises, Inc.	
5. Location Address	4245 52nd Street	6. City Kentwood

7. Submittal Type - *The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.*

- ☐ **Rule 215(1) Notification of change.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 215(2) Notification of change.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 215(3) Notification of change.** *Complete Items 8 – 11 and 14*
- ☐ **Rule 215(5) Notification of change.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 216(1)(a)(i)-(iv) Administrative Amendment.** *Complete Items 8 – 10 and 14*
- ☐ **Rule 216(1)(a)(v) Administrative Amendment.** *Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions.*
- ☒ **Rule 216(2) Minor Modification.** *Complete Items 8 – 12 and 14*
- ☐ **Rule 216(3) Significant Modification.** *Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.*
- ☐ **Rule 216(4) State-Only Modification.** *Complete Items 8 – 12 and 14*

8. Effective date of the change. (MM/DD/YYYY) *See detailed instructions.* 07/01/2024	9. Change in emissions? ☒ Yes ☐ No

10. Description of Change - *Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).*

EUWESTMANOVEN will change from uncontrolled to controlled by routing emission to the exisint RTO and exhausting through stack SV-REGENINCIN.

11. New Source Review Permit(s) to Install (PTI) associated with this application? ☒ Yes ☐ No

If Yes, enter the PTI Number(s) 228-10B ____-____ ____-____ ____-____ ____-____

12. Compliance Status - *A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.*

a. Is the change identified above in compliance with the associated applicable requirement(s)? ☒ Yes ☐ No

b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? ☒ Yes ☐ No

c. If the change includes a future applicable requirement(s), will timely compliance be achieved? ☒ Yes ☐ No

13. Operator's Additional Information ID - *Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.* **AI PTI 228-10B**

14. Contact Name	Telephone No.	E-mail Address
Karen Homrich	616-956-7259	k.homrich@lacksenterprises.com

15. This submittal also updates the ROP renewal application submitted on ____/____/____ ☐ Yes ☒ N/A
(If yes, a mark-up of the affected pages of the ROP must be attached.)

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

App No. 202400088

EGLE Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION
C-001: CERTIFICATION

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

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

Form Type **C-001**	SRN N2079

Stationary Source Name Lacks Enterprises, Inc.	
City Kentwood	County Kent

SUBMITTAL CERTIFICATION INFORMATION

1. Type of Submittal *Check only one box.*

☐ Initial Application (Rule 210) ☒ Notification / Administrative Amendment / Modification (Rules 215/216)

☐ Renewal (Rule 210) ☐ Other, describe on AI-001

2. If this ROP has more than one Section, list the Section(s) that this Certification applies to 1

3. Submittal Media ☒ E-mail ☐ FTP ☐ Disk ☒ Paper

4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.

AI

CONTACT INFORMATION

Contact Name Karen Homrich	Title Environmental Manager
Phone number 616-956-7259	E-mail address k.homrich@lacksenterprises.com

This form must be signed and dated by a Responsible Official.

Responsible Official Name Joe Voss				Title General Plant Manager-Paint Operations
Mailing address J.Voss@LacksTrim.com				
City Kentwood	State MI	ZIP Code 49512	County Kent	Country USA

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

Joe Voss — Signature of Responsible Official

6-26-24 — Date

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: N2079	Section Number (if applicable): 1

1. Additional Information ID
AI-PTI228-10B

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Lacks is proposing to replace the current conditions in the ROP with the conditions approved in PTI 228-10B (attached).

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H_2S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO_x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO_2	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit 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 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department 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 condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

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

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
    a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
    b) A visible emission limit specified by an applicable federal new source performance standard.
    c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

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
EUWESTMANOVEN	This unit consists for one paint dry off oven. VOC emissions are controlled by a regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN.	07/07/1994/ 12/09/2010/ TBD	FGWESTMANUAL FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOOVEN	This unit consists of one dry off oven. VOC emissions are controlled by a regenerative thermal oxidizer. Stack ID SV-REGENINCIN.	07-07-1994/ 12-09-2010 / 02-21-2024	FGWESTMANUAL FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTMANUAL1	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM1.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL2	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM2.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL3	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM3.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL4	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM4.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTMANUAL10	This unit consists of one air-dried manual spray booth to coat plastic parts, one hand spray gun, with dry filters to remove overspray. Stack ID SV-MANBOOTHM10.	07/07/1994/ 12/09/2010	FGWESTMANUAL FGSUBPARTPPPP
EUWESTROBOT1	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07-07-1994/ 12-09-2010	FGWESTROBOPAINT FGSUBPARTPPPP

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUWESTROBOT2	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Stack ID SV-REGENINCIN.	07-07-1994/ 12-09-2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT3	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07-07-1994/ 12-09-2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT4	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07-07-1994/ 12-09-2010 / 02-21-2024	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT5	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07-07-1994/ 12-09-2010 / 02-21-2024	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT6	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07-07-1994/ 12-09-2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT7	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer. Particulate is controlled by a dry mat filter or equivalent technology.	07-07-1994/ 12-09-2010	FGWESTROBOPAINT FGSUBPARTPPPP
EUWESTROBOT8	This group consists of one coating air-dried robotic booth to coat plastic parts. The auto booth emissions are captured and controlled by a regenerative thermal oxidizer (RTO). Particulate is controlled by a dry mat filter or equivalent technology. Stack ID SV-REGENINCIN.	07-07-1994/ 12-09-2010	FGWESTROBOPAINT FGSUBPARTPPPP

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

FLEXIBLE GROUP SPECIAL CONDITIONS

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
FGWESTMANUAL	This flexible group consists of 5 manual spray booths used to coat plastic parts and two dry off ovens located at the 52nd Paint West facility.	EUWESTMANUAL1 EUWESTMANUAL2 EUWESTMANUAL3 EUWESTMANUAL4 EUWESTMANUAL10 EUWESTMANOVEN EUWESTROBOOVEN
FGWESTROBOPAINT	The group consists of eight (8) coating spray booths used to coat plastic parts and two (2) dry off ovens located at the 52nd Paint West facility. The booths use dry filters to remove paint overspray.	EUWESTROBOT1 EUWESTROBOT2 EUWESTROBOT3 EUWESTROBOT4 EUWESTROBOT5 EUWESTROBOT6 EUWESTROBOT7 EUWESTROBOT8 EUWESTROBOOVEN EUWESTMANOVEN

FGWESTMANUAL
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group consists of 5 manual spray booths used to coat plastic parts and two dry off ovens located at the 52nd Paint West facility.

Emission Units: EUWESTMANUAL1, EUWESTMANUAL2, EUWESTMANUAL3, EUWESTMANUAL4, EUWESTMANUAL10, EUWESTMANOVEN, EUWESTROBOOVEN

POLLUTION CONTROL EQUIPMENT

EUWESTMANOVEN and EUWESTROBOOVEN are controlled by the regenerative thermal oxidizer (RTO) associated with FGWESTROBOPAINT. The paint booths are controlled by dry mat filters.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	460 pounds per day	Based upon a 24-hour averaging period as determined at the end of each 24-hour production day.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
2. VOC	5.8 tons per month	As determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
3. VOC	70.0 tons per year	12-month rolling time period as determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
4. VOC Red and black air-dried coatings	5.75 pounds per gallon of coating, minus water, as applied	Based upon a calendar day averaging time period as determined at the end of each calendar day.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21
5. VOC Non-red and black air-dried coatings	5.0 pounds per gallon of coating, minus water, as applied	Based upon a calendar day averaging time period as determined at the end of each calendar day.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Exotic colored coatings	A maximum of 10%, by volume, of all coatings applied.	Based upon a 12-month rolling time period as determined at the end of each calendar month.	FGWESTMANUAL	SC VI.1	R 336.1702(a) R 336.2810 40 CFR 52.21

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall equip and maintain all paint spray booths with High Volume Low Pressure spray guns or equivalent technology with comparable transfer efficiency. **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

2. The permittee may use conventional air atomized spray guns in the spray coat booths for the application of exotic colors only. **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

3. The permittee shall not operate any of the five manual spray booths unless the dry filters are installed and operating properly. **(R 336.1224, R 336.1901, R 336.1910)**

4. The permittee shall dispose of spent filters in a manner that minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1901, R 336.1910)**

5. The permittee shall not operate the dry off oven portion of FGWESTMANUAL at a temperature in excess of 194 °F. **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

6. All waste paints, reducers, catalysts, purge solvents, and cleanup solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

7. The permittee shall recover and reclaim, recycle or dispose of, in accordance with applicable regulations, a minimum of 90% by weight of all purge and cleanup solvents. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the bake oven temperature on a continuous basis. **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received may be determined from manufacturer's formulation data. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)**

2. Within one year of permit issuance and annually thereafter, the permittee shall verify the VOC content of the five most frequently used coatings, plus 2% of the remaining coatings, as received and as applied using federal reference Method 24. The five most frequently used coatings shall be determined based on the previous 12 months from the date of sampling. If at any time, the Method 24 and the manufacturer's formulation values should differ, the highest of the two values shall be used to calculate emissions. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall maintain records of the following: **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   a. Monthly records for each coating sprayed: **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**
      i. The coating identification/coating category (e.g. air-dried red/black coating, air-dried non red/black coating or exotic colors) for each coating used.
      ii. The amount in gallons of coating applied.
      iii. The VOC content in pounds per gallon of coating, minus water, as received and as applied based upon a 24-hour averaging period and determined at the end of each 24-hour production day.
      iv. The VOC content in pounds per gallon of reducers and catalysts and the amounts in gallons applied based upon a 24-hour averaging period and determined at the end of each 24-hour production day.

   b. Monthly records for each purge and cleaning solvent used: **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**
      i. The amount in gallons of solvent used.
      ii. The amount in gallons of solvent reclaimed.
      iii. The percentage (by weight) of solvents reclaimed.
      iv. The VOC content in pounds per gallon of coating as used.

   c. Average VOC emission calculations determining the uncontrolled pounds per gallon of coating, minus water, as applied for air-dried red/black coatings and air-dried non red/black coatings each calendar day. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   d. VOC emission calculations determining the VOC mass emissions for each calendar month in tons per month and a 12-month rolling time period average mass emission at the end of each calendar month in tons per year. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   e. VOC emission calculations determining the VOC emission rate in pounds per day based upon a 24-hour averaging period and determined at the end of each 24-hour production day. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   f. Calculations determining the percentage of exotic coatings used for each calendar month and a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

2. The permittee shall monitor and record the dry off oven temperature on a continuous basis. **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

3. The permittee shall keep, in a satisfactory manner, continuous records of the bake temperature as required by SC VI.2. **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than completion of routing EUWESTMANOVEN to the RTO. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-MANBOOTHM1	24	51	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
2. SV-MANBOOTHM2	24	51	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
3. SV-MANBOOTHM3	24	51	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
4. SV-MANBOOTHM4	24	51	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
5. SV-MANBOOTHM10	24	51	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)
6. SV-REGENINCIN	42	51	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:
[1]This condition is state-only enforceable and was established pursuant to Rule 201(1)(b)

FGWESTROBOPAINT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The group consists of eight (8) coating spray booths used to coat plastic parts and two (2) dry off ovens located at the 52nd Paint West facility.

Emission Unit: EUWESTROBOT1, EUWESTROBOT2, EUWESTROBOT3, EUWESTROBOT4, EUWESTROBOT5, EUWESTROBOT6, EUWESTROBOT7, EUWESTROBOT8, EUWESTROBOOVEN, EUWESTMANOVEN

POLLUTION CONTROL EQUIPMENT

The paint booths and ovens are controlled by a regenerative thermal oxidizer (RTO). The paint booths are controlled by dry mat filters.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	460 pounds per day	Based upon a 24-hour averaging period as determined at the end of each 24-hour production day	FGWESTROBOPAINT	SC VI.2	R 336.1702(a) R 336.2810 40 CFR 52.21
2. VOC	5.75 tons per month	As determined at the end of each calendar month	FGWESTROBOPAINT	SC VI.2	R 336.1702(a) R 336.2810 40 CFR 52.21
3. VOC	67.28 tons per year	12-month rolling time period as determined at the end of each calendar month	FGWESTROBOPAINT	SC VI.2	R 336.1702(a) R 336.2810 40 CFR 52.21

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall equip and maintain all paint spray booths with HVLP spray guns or equivalent technology with comparable transfer efficiency. **(R 336.1702(a), R 336.2810, 40 CFR 52.21)**

2. The permittee shall not operate any of the eight automatic spray booths unless the dry filters are installed and operating properly. **(R 336.1224, R 336.1901, R 336.1910)**

3. The permittee shall not operate any of the eight automatic spray booths or oven unless the thermal incinerator is installed and operating properly. Proper operation of the thermal incinerator includes a minimum VOC destruction efficiency of 95 percent and maintaining a minimum operating temperature of 1400 °F and a minimum retention time of 0.5 seconds. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

4. All waste paints, reducers, catalysts, purge solvents, and cleanup solvents shall be captured and stored in closed containers and be disposed of in an acceptable manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

5. The permittee shall recover and reclaim, recycle or dispose of, in accordance with applicable regulations, a minimum of 90 percent by weight of all purge and cleanup solvents. **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Within 180 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee shall verify the destruction efficiency of the thermal incinerator, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

2. Verification that the direction of air flow at each natural draft opening (NDO) on each robotic booth in FGWESTROBOPAINT is into the booth, by testing at owner's expense, in accordance with Department requirements, will be required on a semiannual basis. The verification of the direction of air flow at the NDOs shall be conducted using the smoke tube test method, or an alternate method. The permittee shall submit a notice of the anticipated test date to the AQD District Supervisor no later than two weeks prior to the test date. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 30 days following the last date of the test. After two consecutive tests demonstrating that the direction of air flow at all NDOs is into the booths, the permittee may request that the monitoring schedule be revised to a less frequent time period as approved by the AQD District Supervisor. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

3. The VOC content, water content, and density of any coating, reducer, and/or solvent as applied and as received may be determined from manufacturer's formulation data. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)**

4. Within one year of permit issuance and annually thereafter, the permittee shall verify the VOC content of the three most frequently used coatings as received and as applied using federal reference Method 24. The three most frequently used coatings shall be determined based on the previous 12 months from the date of sampling. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.2810, 40 CFR 52.21)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

2. The permittee shall maintain the following records: **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

   a) Monthly records for each coating sprayed:
      i. The amount in gallons of coating applied.
      ii. The VOC content in pounds per gallon of coating (minus water) as received and as applied.
      iii. The VOC content in pounds per gallon of reducers and catalysts and the amounts in gallons applied.

   b) Monthly records for each purge and cleaning solvent used:
      i. The amount in gallons of solvent used.
      ii. The amount in gallons of solvent reclaimed.
      iii. The percentage (by weight) of solvents reclaimed.
      iv. The VOC content in pounds per gallon of coating as used.

   c) VOC emission calculations determining the VOC mass emissions for each calendar month in tons per month and a 12-month rolling time period average mass emission at the end of each calendar month in tons per year.

   d) VOC emission calculations determining the VOC emission rate in pounds per day based upon a 24-hour averaging period and determined at the end of each 24-hour production day.

3. The permittee shall monitor, in a satisfactory manner, the temperature in the thermal oxidizer combustion zone on a continuous basis using a thermocouple and paper chart recorder or in a manner and with instrumentation acceptable to the AQD. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

4. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer combustion zone. **(R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.2810, 40 CFR 52.21)**

VII. REPORTING

NA

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. SV-REGENINCIN	42	51	R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart PPPP, as they apply to FGWESTROBOPAINT. **(40 CFR Part 63 Subparts A & PPPP)**

Footnotes:

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